

EPA Jacket 71297-3

Vol.1

S: 789146

Regulatory Type: Product Registration - Section 3

Application Type: Amendment

Company: 71297 AGRO-FRESH INC. ☒

Risk Manager: Biologicals & Pollution Prevention Division, PM Team 90

Product #: 71297-3 Product Name: SMARTFRESH SMARTTABS

Me Too Section 3: Me Too Product Name:

Application Date: 12-Jan-2006 ☒ OPP Rec'd Date: 17-Jan-2006 ☒

Front End Date: 19-Jan-2006 ☒ Risk Manager Send Date: 20-Jan-2006 ☒

FFS Due Date: Negotiated Due Date:

OPP Target Date:

Fast Track: ☐ New Ingredient: ☐

Receipt Description: AMENDMENT TO ADD PERSIMMON TO THE LABEL

JAN 23 2006

Form A: ☐ Signature Date: Form B: ☐ Signature Date:

EPA... NP104 8:12 AM

300 Fast Team

EH
1-24-06

See 180.1220

789146	300
76	1155

AIO
JAN 25 2006

sdh

Receipt for Section 3

S: 783373 Resubmission: ☐ Yes ☒ No

Regulatory Type: Product Registration - Section 3 Fee For Service: ☒ Yes ☐ No

Application Type: Amendment Billable: ☐ Yes ☒ No

Company: 71297 AGRO FRESH INC. ☒

Risk Manager: Biologicals & Pollution Prevention Division, PM Team 90

Product #: 71297-3 Product Name: SMARTFRESH SMARTTABS

Override#:

Me Too Section3: Me Too Product Name:

Application Date: 17-Aug-2005 ☒ OPP Rec'd Date: 19-Aug-2005 ☒

Front End Date: 24-Aug-2005 ☒ Risk Manager Send Date: 24-Aug-2005 ☒

FFS Due Date: Negotiated Due Date:

OPP Target Date:

Fast Track: ☐ New Ingredient: ☐

Receipt Description:

THIS AMENDMENT IS TO ADD KIMFRUIT TO THE LABEL OF SMARTFRESH SMART TABS AND TO INCREASE THE APPLICATION RATE ON AVOCADOS

New Ingredient Request Date:

New Ingredient Received Date:

Form A: ☐ Signature Date: Form B: ☐ Signature Date:

Print Letter
Enter More Information
Tracking

EPA-OPPIN Main 3:53 PM

Rec'd.
AUG 26 2005
BPPD

Boo Fast Team
H 8/30

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SEP 1 2005

sdt

Receipt for Section 3

S: Resubmission: ☐ Yes ☒ No

Regulatory Type: Fee For Service: ☒ Yes ☐ No

Application Type: Billable: ☒ Yes ☐ No

Company: ☒

Risk Manager:

Product #: Product Name:

Override #:

Me Too Section3: Me Too Product Name:

Application Date: ☒ OPP Rec'd Date: ☒

Front End Date: ☒ Risk Manager Send Date: ☒

FFS Due Date: Negotiated Due Date:

OPP Target Date:

Fast Track: ☐ New Ingredient: ☐

Receipt Description:

New Ingredient Request Date:

New Ingredient Received Date:

Form A: ☐ Signature Date: Form B: ☐ Signature Date:

[Print Letter](#)

[Enter More Information](#)

[Tracking](#)

[Receipt Content](#)

EPA-OPPIN Main - C...

12:16 PM

783066 | 300
 76 | 17

AIO
 AUG 18 2005
 sch

Receipt for Section 3

S: 778851

Regulatory Type: Product Registration - Section 3 ☐ Yes ☒ No

Application Type: Amendment ☐ Yes ☒ No

Company: 71297 AGRO FRESH INC. ☒

Risk Manager: Biologicals & Pollution Prevention Division, PM Team 90

Product #: 71297-3 Product Name: SMARTFRESH SMARTTABS

Me Too Section 3: Me Too Product Name:

Application Date: 09-May-2005 ☒ OPP Rec'd Date: 12-May-2005 ☒

Front End Date: 12-May-2005 ☒ Risk Manager Send Date: 16-May-2005 ☒

FFS Due Date: Negotiated Due Date:

OPP Target Date:

Fast Track: ☐ New Ingredient: ☐

Receipt Description:

THIS AMENDMENT IS TO ADD BROCCOLI TO THE LABEL OF SMARTFRESH SMART TABS.

MAY 18 2005

New Ingredient Request Date:

New Ingredient Received Date:

Form A: ☐ Signature Date: Form B: ☐ Signature Date:

Print Letter

Enter More Information

Receipt Content

FAST TEAM
300

addition of crop

check fol. exempt to ensure coverage
w/ 5/20/05

778851	300
Tb	12

AIO
JUN 2 2005

sdh

Receipt for Section 3

S: 759323

Regulatory Type: Product Registration - Section 3 Reimbursement: ☐ Yes ☒ No

Application Type: Amendment Fee For Service: ☐ Yes ☒ No

Company: 71297 AGRO FRESH INC. **V**

Risk Manager: Biologicals & Pollution Prevention Division, PM Team 90

Product #: 71297-3 Product Name: SMARTFRESH SMARTTABS

Me Too Section 3: Me Too Product Name:

Application Date: 22-Apr-2004 **ic** OPP Rec'd Date: 28-Apr-2004 **ic**

Front End Date: 29-Apr-2004 **ic** Risk Manager Send Date: 29-Apr-2004 **ic**

Fast Track: ☐ New Ingredient: ☐

Receipt Description:

Form A: ☐ Signature Date: Form B: ☐ Signature Date:

Receipt Content

759323 | 300
 TG | 17

AIO
 MAY 6 2004
 sdh

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAR 22 2006

789146	300
TG	1155

Dr. Ann Hecht Beaulieu
 AgroFresh Inc.
 c/o Rohm and Haas Company
 100 Independence Mall West
 Philadelphia, PA 19105

Re: Label Amendment to add persimmon to the label: Application Dated 1/12/06
Product Name: Smart Fresh™ Smart Tabs
EPA Registration Number: 71297-3

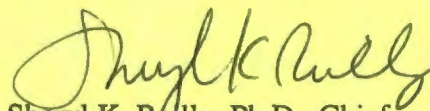
Dear Dr. Beaulieu:

The amendment referred to above, submitted in connection with registration under FIFRA section 3(c)(7)(A), is acceptable provided that you:

1. Submit and/or cite all data required for registration/reregistration of your product under FIFRA section 3(c)(5) when the Agency requires all registrants of similar products to submit such data.
2. Submit five (5) copies of your final printed labeling before you release the product for shipment. Final printed labeling means the label or labeling of the product when distributed or sold. Clearly legible reproductions or photo reductions will be accepted for unusual labels, such as those silk-screened directly onto glass or metal containers or large bags or drum labels. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

Sincerely,



Sheryl K. Reilly, Ph.D., Chief
 Biochemical Pesticides Branch
 Biopesticides and Pollution
 Prevention Division (7511C)

Enclosure

CONCURRENCES

SYMBOL	7511C	7511C	7511C					
SURNAME	Gibbons	Peterson	Reilly					
DATE	3/14/06	3/17/06	3/20/06					

SmartFresh™ SmartTabs	AgroFresh Inc. A subsidiary of Rohm and Haas Company Philadelphia, PA. 19106 Tel: (215) 592-3000
----------------------------------	---

Active Ingredient:

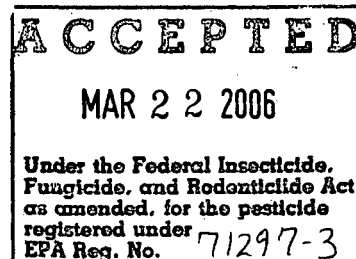
1-Methylcyclopropene.....0.63%

Other Ingredients:.....99.37%

Total:100.0%

EPA REGISTRATION NO. 71297-3

EPA EST. NO. 707-WA-001



NOTICE: Before using this product, read the entire Precautionary Statements, Conditions of Sale and Warranty, Directions for Use, Use Restrictions and Storage and Disposal Instructions. If the Conditions of Sale and Warranty are not acceptable, return the product and its generating system unopened and unused within thirty days of purchase to the place of purchase.

Keep Out Of Reach Of Children

CAUTION

FIRST AID

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes.

Remove contact lenses if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 215-592-3000 for emergency medical treatment information.

Net Contents: 10 tablets, 0.44 ounces (12.5 g)

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Causes slight eye irritation. Harmful if absorbed through skin. Harmful if inhaled. Harmful if swallowed. Avoid contact with skin, eyes or clothing. Avoid breathing vapor. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators of this product must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Safety glasses or goggles

User Safety Recommendations

- Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Applicators and handlers must follow manufacturer's instructions for cleaning / maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your state or tribe, consult the State or Tribal Agency responsible for pesticide regulation. All applicable directions, restrictions, precautions and conditions of sale and warranty are to be followed. This labeling must be in the user's possession during application.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Workers Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas prior to venting the volatile active ingredient from the treatment room and during the REI of 30 minutes after the room has been vented.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, prior to venting the volatile active ingredient from the treatment room is:

- Coveralls
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P, or HE prefilter.

GENERAL INFORMATION

SmartFresh™ is a unique postharvest tool for counteracting many of the undesirable effects of both internal (produced within the fruit or vegetable) and external sources of ethylene on harvested fruit and vegetables. By counteracting ethylene, SmartFresh™ provides many benefits to the fruit and vegetables during transport and storage including:

- Maintaining firmness
- Maintaining titratable acidity
- Preventing superficial scald and soft scald on apples
- Reducing internal ethylene production
- Protection from external sources of ethylene
- Reducing respiration
- Delaying ripening and senescence
- Reducing incidence of peel greasiness in apples
- Reducing incidence of core flush and mealiness in apples
- Reducing chilling injury

SmartFresh™ can be used immediately after harvest, prior to storage, prior to shipment or just prior to sale. SmartFresh™ is effective under both cool (below 55 °F, 13 °C) and warm (above 55°F, 13°C) temperature conditions. To realize maximum benefit in controlling senescence, treat fruits and vegetables as soon as possible after harvest.

Harvested fruit and vegetables must be exposed to the volatile active ingredient of SmartFresh™ in enclosed areas, such as storage rooms, greenhouses, coolers, shipping containers, enclosed truck trailers, or ambient temperature, refrigerated, or controlled atmosphere food storage facilities. This product is not intended for use outdoors or in other non-enclosed areas. These enclosed treatment areas must be gas tight as leakage will reduce SmartFresh™'s effectiveness.

Fruit And Vegetable Storage Conditions

SmartFresh™ is compatible with and complementary to both controlled atmosphere and regular air fruit and vegetable storage conditions. SmartFresh™ must be used in air tight storage areas.

Timing of Application

SmartFresh™ can be added to the storage area containing fruit or vegetables immediately after harvest, upon entering storage, during distribution or in transit. After application, fruit or vegetables not for immediate sale must be stored according to good standard commercial practices. It must be emphasized that maintaining the cold chain (keeping the fruit and vegetables cool at all times) and strict adherence to phytosanitary practices remain essential in maintaining safe and high quality fruit and vegetables.

Apples: Apply SmartFresh™ soon after harvest. Best results are obtained when fruit is at the optimum maturity level for long term storage. For optimum quality, store apples that are to be held longer than six months in a controlled atmosphere.

Avocados: Apply SmartFresh™ to the fruit soon after harvest at the physiological maturity stage or just prior to the "turning black" stage.

Bananas: Apply SmartFresh™ after the bananas have been exposed to ethylene and prior to reaching color stage 4.

Broccoli: Apply SmartFresh™ as soon after harvest as possible.

Kiwifruit: Apply SmartFresh™ either as soon after harvest as possible or after long term storage and before the fruit are transported and distributed. Do not make more than one application to the same fruit.

Melons: Apply SmartFresh™ as soon after harvest as possible.

Persimmons: Apply SmartFresh™ as soon after harvest as possible.

Tomatoes: Apply SmartFresh™ between color stage mature green (Color Stage 1) and light red (Color Stage 5).

Application Method

Prior to application, ensure that the treatment area can be properly and promptly sealed following application. SmartFresh™ SmartTabs are used in conjunction with the SmartFresh™ Activator Kit. SmartFresh™ SmartTabs are **Green** tablets that, when mixed with **Blue** Activator Tablets in a proprietary Activator Solution, release the volatile active ingredient 1-methylcyclopropene (1-MCP). Make sure that you have a sufficient supply of both SmartFresh™ SmartTabs and SmartFresh™ Activator Kits available to treat your selected treatment area.

Step 1: Selection of the appropriate number of SmartTabs and SmartTab Activator Kits for use

a.) Accurately determine the volume of your EMPTY treatment area in cubic feet. Multiply inside dimensions: volume = length X width X height.

b.) Choose the correct number of **Green** SmartFresh™ SmartTabs from Table 1 below according to the size of the area and the crop to be treated.

Table 1. Number of **Green** SmartTabs Required

Volume of Treatment Area ft ³	Banana	Melon Tomato Kiwi Persimmon	Apple Avocado Broccoli
706 to 882	2	3	6
883 to 1058	3	4	8
1059 to 1235	3	5	9
1236 to 1412	4	6	11
1413 to 1588	4	6	12
1589 to 1765	5	7	14
1766 to 1941	5	8	15
1942 to 2118	5	9	17
2119 to 2294	6	9	19
2295 to 2471	6	10	20
2472 to 2648	7	11	22
2649 to 2824	7	12	23
2825 to 3001	8	12	25
3002 to 3177	8	13	26
3178 to 3354	9	14	28
3355 to 3530	9	15	29
3531 to 3707	9	15	31
3708 to 3884	10	16	32
3885 to 4060	10	17	34
4061 to 4237	11	18	36
4238 to 4413	11	18	37
4414 to 4590	12	19	39
4591 to 4766	12	20	40
4767 to 4943	13	21	42
4944 to 5120	13	21	43
5121 to 5296	14	22	45

Never use more than ten (10) **Green** SmartFresh™ SmartTabs per activator kit. If more than ten (10) **Green** SmartFresh™ SmartTabs are needed, you must divide them among two (2) or more SmartFresh™ Activator Kits. Each Kit activates up to 10 SmartFresh™ SmartTabs only.

Always use two (2) Blue tablets for EACH Release Kit.

Table 1. Number of **Green SmartTabs** Required
Continued

Volume of Treatment Area ft ³	Banana	Melon Tomato Kiwi Persimmon	Apple Avocado Broccoli
5297 to 5473	14	23	46
5474 to 5649	14	24	48
5650 to 5826	15	24	49
5827 to 6002	15	25	51
6003 to 6179	16	26	53
6180 to 6356	16	27	54
6357 to 6532	17	27	56
6533 to 6709	17	28	57
6710 to 6885	18	29	59
6886 to 7062	18	30	60
7063 to 7239	18	30	62
7240 to 7415	19	31	63
7416 to 7592	19	32	65
7593 to 7768	20	33	67
7769 to 7945	20	33	68
7946 to 8121	21	34	70
8122 to 8298	21	35	71
8299 to 8475	22	36	73
8476 to 8651	22	37	74
8652 to 8828	23	37	76
8829 to 9004	23	38	77
9005 to 9181	23	39	79
9182 to 9357	24	39	80
9358 to 9534	24	40	82
9535 to 9711	25	41	84
9712 to 9887	25	42	85
9888 to 10064	26	42	87
10065 to 10240	26	43	88
10241 to 10417	27	44	90
10418 to 10593	27	45	91
10594 to 10770	27	45	93
10771 to 10947	28	46	94

Never use more than ten (10) **Green SmartFresh™** SmartTabs per activator kit. If more than ten (10) **Green SmartFresh™** SmartTabs are needed, you must divide them among two (2) or more SmartFresh™ Activator Kits. Each Kit activates up to 10 SmartFresh™ SmartTabs only.

Always use two (2) Blue tablets for EACH Release Kit.

Step 2. Evaluation Of The Quality Of The Treatment Room / Trailer / Container

To be used with SmartFresh™, rooms/containers/trailers must be gas tight and have an internal fan for mixing the atmosphere.

Check that:

- All Room/Trailer/Container drain holes are plugged
- There are no holes in the walls, ceiling, or floor
- All vents to outside air are closed
- When viewed from a dark interior, no outside light is visible
- Door seals are in EXCELLENT condition
 - No missing rubber No large cracks
 - No plastic slat doors No roller top doors
 - No side doors
- Scrubbers and/or ozone generators are off

Step 3: Fill the treatment room with the fruit or vegetables to be treated

Step 4: Release of 1-MCP

- a) Remove the pack of two (2) Blue SmartFresh™ Activator Tablets from the foam block.
Always use both Blue tablets.
- b) Remove the appropriate number of **Green** SmartTabs from the SmartFresh™ SmartTabs Package.
- c) Peel off the foil seal from the SmartFresh™ Activator Solution taking care not to spill the solution.
- d) Add both the **Blue** and **Green** Tablets to the Activator Solution.
- e) Replace the cap.
- f) Place the small container on a level surface e.g. in the bottom gap of the pallet. Keep the container upright.
- g) Exit the treatment room immediately and promptly close the doors and ensure they are tightly sealed in order to contain the SmartFresh™ and ensure its maximum efficacy. The release of SmartFresh™ to the area will start several minutes after addition of the SmartTabs to the Activator Solution.
- h) Circulate air in the room by means of the internal air circulation system for AT LEAST one (1) hour.
- i) Do not open the doors for AT LEAST twelve (12) hours.
- j) For controlled atmosphere storage containers or storage rooms, do not change the room atmosphere to controlled atmosphere conditions for AT LEAST twelve (12) hours.

Step 5: Reentry To The Storage Area

At the end of the SmartFresh™ treatment period, vent the treated room by opening the doors for a minimum of thirty minutes with continued full internal ventilation before allowing workers to enter. At the end of the room venting, remove the SmartFresh™ Activator Solution and dispose of it as non-hazardous waste on-site or at an approved waste disposal facility. Store treated fruit and vegetables not intended for immediate sale according to standard commercial practices, in either refrigerated air or controlled atmosphere conditions.

Restrictions

Maximum season use rate: One application with appropriate number of tablets

Do not smoke during the SmartFresh™ application.

Do not treat fruit or vegetables stressed from poor fertility, heat, drought or sunscald.

Do not treat fruit that have had a pre-harvest application of ethephon.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in original packaging in a cool, dry place.

Pesticide Disposal: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse or equivalent. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

CONDITIONS OF SALE AND WARRANTY

AgroFresh Inc. warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label only when used in accordance with label directions under normal conditions of use. AgroFresh Inc. **MAKES NO OTHER EXPRESS OR IMPLIED WARRANTIES EITHER OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE.** Handling, storage and use of the product by Buyer or User are beyond the control of AgroFresh Inc. and Seller. Risks such as crop injury, ineffectiveness or other unintended consequences resulting from, but not limited to, weather or soil conditions, presence of other materials, disease, pests, drift to other crops or property, or failure to follow label directions will be assumed by the Buyer or User. **TO THE FULLEST EXTENT PERMITTED BY LAW, AgroFresh Inc. OR SELLER SHALL NOT BE HELD LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE HANDLING, STORAGE OR USE OF THIS PRODUCT**

SmartFresh™ is a registered trademark of AgroFresh, Inc./Rohm and Haas Company

AgroFresh Inc.
A Fully-Owned Subsidiary of Rohm and Haas Company
100 Independence Mall West
Philadelphia, PA. 19106
(215) 592-3000

EPA Reg. No.: 71297-3
 RAL: T. Gibbons

BPPD Label Amendment Check List

Application Date: 1/12/06
Internal BBPD Guidance Document - Other Items May be Required Updated 7/02

No.	Check List Item	Yes	No
1.	Application Form (EPA Form 8570-1) -signed & complete including package type? If NO, STOP! Call applicant and have them correct application and resubmit.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
1a.	Fast-Track?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2.	Amendment covered by PR Notice 98-10 (Notifications)? If YES, STOP. Call applicant and inform them that this submission will be converted to a notification. After closing out in PRATS, forward to Notification Review Coordinator.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3.	Final printed labeling received for previous action? If NO, Stop! E-mail applicant and request final printed labeling (FPL). Inform them that FPL from the last accepted label is needed to support the current application. File e-mail as record of notification. Log out of PRATS (label deficiency).	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.	Data and Data Matrix (EPA Form 8570-35)	(NA)	
	a) using Selective Method? [If NO, (Data Matrix not required), skip to Item 5.]	<input type="checkbox"/>	<input type="checkbox"/>
	1) Complete Data Matrix. Minimum Data Matrix for registration includes: Product specific acute tox and product chemistry data, plus Efficacy data for Public Health pests claimed on label.	<input type="checkbox"/>	<input type="checkbox"/>
	b) Adequate Product Specific data	<input type="checkbox"/>	<input type="checkbox"/>
	c) Registered source used for active ingredient? If Yes, active ingredient is from a registered source and generic data should be satisfied by registered source. Skip to Item 5. If No, generic data is necessary.	<input type="checkbox"/>	<input type="checkbox"/>
	d) Data passed 86-5? (Data formatting PR Notice)	<input type="checkbox"/>	<input type="checkbox"/>
	e) Public copy of Matrix provided? (As required by PRN 98-5)	<input type="checkbox"/>	<input type="checkbox"/>
5.	Certification with Respect to Citation of Data (EPA Form 8570-34) See 40 CFR 152.80-98 and PR Notice 98-5 [Note: If no data are required or submitted, a Certification with Respect to Citation of Data form is not needed. This is often true for minor amendments.]	(NA)	
	a) Did applicant check a Method of Support?	<input type="checkbox"/>	<input type="checkbox"/>
	b) General Offer to Pay checked for Cite-all Method or Cite-all under Selective Method?	<input type="checkbox"/>	<input type="checkbox"/>
	c) Is the form signed and dated?	<input type="checkbox"/>	<input type="checkbox"/>
	d) Check form and Data Matrix; are Exclusive Use data cited from other sources?	<input type="checkbox"/>	<input type="checkbox"/>
	1.) If Yes, is the required authorization letter included in application?	<input type="checkbox"/>	<input type="checkbox"/>
6.	Label(s) Review	Date of Label Review: <u>3/8/06</u>	
	Bob Torla Concurrence for OMRI Logo:		
a.	Label(s) agrees with current Label Review Manual and appropriate REDS	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	Labeling from acute tox, product chemistry and efficacy data (Public Health pests)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	Nominal concentration of active ingredient shown in ingredients statement	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	Viability included as substatement of Ingredient Statement (if live microbial, e.i., cfu/gram)	MA	<input type="checkbox"/>
e.	Storage and disposal instructions agree with container types listed on application form	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f.	Unique Product Name for Same Company (Check REFS)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g.	Labeling is acceptable. Corrections or changes are NOT necessary.	<input checked="" type="checkbox"/>	<input type="checkbox"/>



Ann Hecht Dr Beaulieu
<ABeaulieu@agrofresh.com>

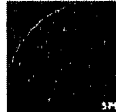
03/14/06 03:12 PM

To: Tasha Gibbons/DC/USEPA/US@EPA
cc:
bcc:
Subject: SmartFresh SmartTabs updated page one

Tasha,

thanks for calling. here is the label with the updated page one. let me know if you need anything else.

Ann Hecht Beaulieu | Director | Regulatory Affairs | AgroFresh Inc.
phone: + 1-215-619-5534 | fax: + 1-215-619-1684 | www.smartfresh.com



PersimmonSmartTablabelJanuary2006nocolor_revisedpage1.doc **SmartFresh**

SmartFresh™ SmartTabs	AgroFresh Inc. A subsidiary of Rohm and Haas Company Philadelphia, PA. 19106 Tel: (215) 592-3000
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Active Ingredient:

1-Methylcyclopropene.. 0.63%

Other Ingredients: 99.37%

Total: 100.0%

EPA REGISTRATION NO. 71297-3

EPA EST. NO. 707-WA-001

NOTICE: Before using this product, read the entire Precautionary Statements, Conditions of Sale and Warranty, Directions for Use, Use Restrictions and Storage and Disposal Instructions. If the Conditions of Sale and Warranty are not acceptable, return the product and its generating system unopened and unused within thirty days of purchase to the place of purchase.

Keep Out Of Reach Of Children

CAUTION

FIRST AID

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 215-592-3000 for emergency medical treatment information.

Net Contents: 10 tablets (12.5 g)

*↑
need U.S. units
(9/8/05 stamped
had 4402 listed...)*

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Causes slight eye irritation. Harmful if absorbed through skin. Harmful if inhaled. Harmful if swallowed. Avoid contact with skin, eyes or clothing. Avoid breathing vapor. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

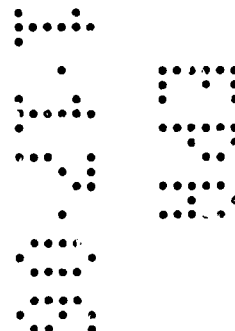
Applicators of this product must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Safety glasses or goggles

User Safety Recommendations

- Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Applicators and handlers must follow manufacturer's instructions for cleaning / maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.



DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your state or tribe, consult the State or Tribal Agency responsible for pesticide regulation. All applicable directions, restrictions, precautions and conditions of sale and warranty are to be followed. This labeling must be in the user's possession during application.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Workers Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas prior to venting the volatile active ingredient from the treatment room and during the REI of 30 minutes after the room has been vented.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, prior to venting the volatile active ingredient from the treatment room is:

- Coveralls
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P, or HE prefilter.

GENERAL INFORMATION

SmartFresh™ is a unique postharvest tool for counteracting many of the undesirable effects of both internal (produced within the fruit or vegetable) and external sources of ethylene on harvested fruit and vegetables. By counteracting ethylene, SmartFresh™ provides many benefits to the fruit and vegetables during transport and storage including:

- Maintaining firmness
- Maintaining titratable acidity
- Preventing superficial scald and soft scald on apples
- Reducing internal ethylene production
- Protection from external sources of ethylene
- Reducing respiration
- Delaying ripening and senescence
- Reducing incidence of peel greasiness in apples
- Reducing incidence of core flush and mealiness in apples
- Reducing chilling injury

SmartFresh™ can be used immediately after harvest, prior to storage, prior to shipment or just prior to sale. SmartFresh™ is effective under both cool (below 55 °F, 13 °C) and warm (above 55°F, 13°C) temperature conditions. To realize maximum benefit in controlling senescence, treat fruits and vegetables as soon as possible after harvest.

Harvested fruit and vegetables must be exposed to the volatile active ingredient of SmartFresh™ in enclosed areas, such as storage rooms, greenhouses, coolers, shipping containers, enclosed truck trailers, or ambient temperature, refrigerated, or controlled atmosphere food storage facilities. This product is not intended for use outdoors or in other non-enclosed areas. These enclosed treatment areas must be gas tight as leakage will reduce SmartFresh™'s effectiveness.

Fruit And Vegetable Storage Conditions

SmartFresh™ is compatible with and complementary to both controlled atmosphere and regular air fruit and vegetable storage conditions. SmartFresh™ must be used in air tight storage areas.

Timing of Application

SmartFresh™ can be added to the storage area containing fruit or vegetables immediately after harvest, upon entering storage, during distribution or in transit. After application, fruit or vegetables not for immediate sale must be stored according to good standard commercial practices. It must be emphasized that maintaining the cold chain (keeping the fruit and vegetables cool at all times) and strict adherence to phytosanitary practices remain essential in maintaining safe and high quality fruit and vegetables.

Apples: Apply SmartFresh™ soon after harvest. Best results are obtained when fruit is at the optimum maturity level for long term storage. For optimum quality, store apples that are to be held longer than six months in a controlled atmosphere.

Avocados: Apply SmartFresh™ to the fruit soon after harvest at the physiological maturity stage or just prior to the "turning black" stage.

Bananas: Apply SmartFresh™ after the bananas have been exposed to ethylene and prior to reaching color stage 4.

Broccoli: Apply SmartFresh™ as soon after harvest as possible.

Kiwifruit: Apply SmartFresh™ either as soon after harvest as possible or after long term storage and before the fruit are transported and distributed. Do not make more than one application to the same fruit.

Melons: Apply SmartFresh™ as soon after harvest as possible.

Persimmons: Apply SmartFresh™ as soon after harvest as possible.

Tomatoes: Apply SmartFresh™ between color stage mature green (Color Stage 1) and light red (Color Stage 5).

Application Method

Prior to application, ensure that the treatment area can be properly and promptly sealed following application. SmartFresh™ SmartTabs are used in conjunction with the SmartFresh™ Activator Kit. SmartFresh™ SmartTabs are **Green** tablets that, when mixed with **Blue** Activator Tablets in a proprietary Activator Solution, release the volatile active ingredient 1-methylcyclopropene (1-MCP). Make sure that you have a sufficient supply of both SmartFresh™ SmartTabs and SmartFresh™ Activator Kits available to treat your selected treatment area.

Step 1: Selection of the appropriate number of SmartTabs and SmartTab Activator Kits for use

a.) Accurately determine the volume of your EMPTY treatment area in cubic feet. Multiply inside dimensions: volume = length X width X height.

b.) Choose the correct number of **Green** SmartFresh™ SmartTabs from Table 1 below according to the size of the area and the crop to be treated.

Table 1. Number of **Green** SmartTabs Required

Volume of Treatment Area ft ³	Banana	Melon Tomato Kiwi Persimmon	Apple Avocado Broccoli
706 to 882	2	3	6
883 to 1058	3	4	8
1059 to 1235	3	5	9
1236 to 1412	4	6	11
1413 to 1588	4	6	12
1589 to 1765	5	7	14
1766 to 1941	5	8	15
1942 to 2118	5	9	17
2119 to 2294	6	9	19
2295 to 2471	6	10	20
2472 to 2648	7	11	22
2649 to 2824	7	12	23
2825 to 3001	8	12	25
3002 to 3177	8	13	26
3178 to 3354	9	14	28
3355 to 3530	9	15	29
3531 to 3707	9	15	31
3708 to 3884	10	16	32
3885 to 4060	10	17	34
4061 to 4237	11	18	36
4238 to 4413	11	18	37
4414 to 4590	12	19	39
4591 to 4766	12	20	40
4767 to 4943	13	21	42
4944 to 5120	13	21	43
5121 to 5296	14	22	45

Never use more than ten (10) **Green** SmartFresh™ SmartTabs per activator kit. If more than ten (10) **Green** SmartFresh™ SmartTabs are needed, you must divide them among two (2) or more SmartFresh™ Activator Kits. Each Kit activates up to 10 SmartFresh™ SmartTabs only.

Always use two (2) Blue tablets for EACH Release Kit.

Table 1. Number of **Green** SmartTabs Required
Continued

Volume of Treatment Area ft ³	Banana	Melon Tomato Kiwi Persimmon	Apple Avocado Broccoli
5297 to 5473	14	23	46
5474 to 5649	14	24	48
5650 to 5826	15	24	49
5827 to 6002	15	25	51
6003 to 6179	16	26	53
6180 to 6356	16	27	54
6357 to 6532	17	27	56
6533 to 6709	17	28	57
6710 to 6885	18	29	59
6886 to 7062	18	30	60
7063 to 7239	18	30	62
7240 to 7415	19	31	63
7416 to 7592	19	32	65
7593 to 7768	20	33	67
7769 to 7945	20	33	68
7946 to 8121	21	34	70
8122 to 8298	21	35	71
8299 to 8475	22	36	73
8476 to 8651	22	37	74
8652 to 8828	23	37	76
8829 to 9004	23	38	77
9005 to 9181	23	39	79
9182 to 9357	24	39	80
9358 to 9534	24	40	82
9535 to 9711	25	41	84
9712 to 9887	25	42	85
9888 to 10064	26	42	87
10065 to 10240	26	43	88
10241 to 10417	27	44	90
10418 to 10593	27	45	91
10594 to 10770	27	45	93
10771 to 10947	28	46	94

Never use more than ten (10) **Green** SmartFresh™ SmartTabs per activator kit. If more than ten (10) **Green** SmartFresh™ SmartTabs are needed, you must divide them among two (2) or more SmartFresh™ Activator Kits. Each Kit activates up to 10 SmartFresh™ SmartTabs only.

Always use two (2) Blue tablets for EACH Release Kit.

Step 2. Evaluation Of The Quality Of The Treatment Room / Trailer / Container

To be used with SmartFresh™, rooms/containers/trailers must be gas tight and have an internal fan for mixing the atmosphere.

Check that:

- All Room/Trailer/Container drain holes are plugged
- There are no holes in the walls, ceiling, or floor
- All vents to outside air are closed
- When viewed from a dark interior, no outside light is visible
- Door seals are in EXCELLENT condition
 - No missing rubber No large cracks
 - No plastic slat doors No roller top doors
 - No side doors
- Scrubbers and/or ozone generators are off

Step 3: Fill the treatment room with the fruit or vegetables to be treated

Step 4: Release of 1-MCP

- a) Remove the pack of two (2) Blue SmartFresh™ Activator Tablets from the foam block.
Always use both Blue tablets.
- b) Remove the appropriate number of **Green** SmartTabs from the SmartFresh™ SmartTabs Package.
- c) Peel off the foil seal from the SmartFresh™ Activator Solution taking care not to spill the solution.
- d) Add both the **Blue** and **Green** Tablets to the Activator Solution.
- e) Replace the cap.
- f) Place the small container on a level surface e.g. in the bottom gap of the pallet. Keep the container upright.
- g) Exit the treatment room immediately and promptly close the doors and ensure they are tightly sealed in order to contain the SmartFresh™ and ensure its maximum efficacy. The release of SmartFresh™ to the area will start several minutes after addition of the SmartTabs to the Activator Solution.
- h) Circulate air in the room by means of the internal air circulation system for AT LEAST one (1) hour.
- i) Do not open the doors for AT LEAST twelve (12) hours.
- j) For controlled atmosphere storage containers or storage rooms, do not change the room atmosphere to controlled atmosphere conditions for AT LEAST twelve (12) hours.

Step 5: Reentry To The Storage Area

At the end of the SmartFresh™ treatment period, vent the treated room by opening the doors for a minimum of thirty minutes with continued full internal ventilation before allowing workers to enter. At the end of the room venting, remove the SmartFresh™ Activator Solution and dispose of it as non-hazardous waste on-site or at an approved waste disposal facility. Store treated fruit and vegetables not intended for immediate sale according to standard commercial practices, in either refrigerated air or controlled atmosphere conditions.

Restrictions

Maximum season use rate: One application with appropriate number of tablets

Do not smoke during the SmartFresh™ application.

Do not treat fruit or vegetables stressed from poor fertility, heat, drought or sunscald.

Do not treat fruit that have had a pre-harvest application of ethephon.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in original packaging in a cool, dry place.

Pesticide Disposal: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse or equivalent. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

CONDITIONS OF SALE AND WARRANTY

AgroFresh Inc. warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label only when used in accordance with label directions under normal conditions of use. AgroFresh Inc. **MAKES NO OTHER EXPRESS OR IMPLIED WARRANTIES EITHER OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE.** Handling, storage and use of the product by Buyer or User are beyond the control of AgroFresh Inc. and Seller. Risks such as crop injury, ineffectiveness or other unintended consequences resulting from, but not limited to, weather or soil conditions, presence of other materials, disease, pests, drift to other crops or property, or failure to follow label directions will be assumed by the Buyer or User. **TO THE FULLEST EXTENT PERMITTED BY LAW, AgroFresh Inc. OR SELLER SHALL NOT BE HELD LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE HANDLING, STORAGE OR USE OF THIS PRODUCT**

SmartFresh™ is a registered trademark of AgroFresh, Inc./Rohm and Haas Company

AgroFresh Inc.
A Fully-Owned Subsidiary of Rohm and Haas Company
100 Independence Mall West
Philadelphia, PA. 19106
(215) 592-3000



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

January 20, 2006

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

ANN HECHT BEAULIEU
AGRO FRESH INC.
C/O ROHM AND HAAS COMPANY
100 INDEPENDENCE MALL WEST
PHILADELPHIA, PA 19105

PRODUCT NAME: SMARTFRESH SMARTTABS
COMPANY NAME: AGRO FRESH INC.
EPA FILE SYMBOL: 71297-3
EPA RECEIPT DATE: 01/17/06

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Biologicals & Pollution Prevention Division, PM Team 90, at (703) 308-8712.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. W. H. C.", is written over the typed name.

Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

Fee for Service



This package includes the following

- ☐ New Registration
- ☒ Amendment

☐ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: _____

for Division

- ☐ AD
- ☒ BPPD
- ☐ RD

Risk Mgr. 90

Receipt No.

S- 789146

EPA File Symbol/Reg. No.

71297-3

Pin-Punch Date:

1/17/06

☒ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: \$ _____

Parent/Child Decisions:

Reviewer: *S. Ruff*

Date: *1/19/06*

Remarks:

Fast Track label Amendment

January 12, 2006

Mr. Driss Benmhend
Office Of Pesticide Programs (7511C)
Biopesticides and Pollution Prevention Division
U.S. Environmental Protection Agency
Room 910, Crystal Mall 2
1801 South Bell Street
Arlington, VA 22202-4501

Dear Mr. Benmhend:

Re: SmartFresh™ SmartTabs
EPA Registration Number 71297-3
Active Ingredient = 1-methylcyclopropene
Amendment to add Persimmon to the label

Enclosed is an application to amend the label of SmartFresh™ SmartTabs by adding persimmon to the label

No data are required to support this amendment since:

1. Persimmon is already approved for use on the label of SmartFresh™ (EPA Registration Number 71297-2), a powder formulation of the same active ingredient, 1-methylcyclopropene.
2. The use rate for persimmon, 500 ppb (v/v), and number of applications (1) are the same as prescribed on the SmartFresh™ label
3. The use pattern (indoor, postharvest) and method of application for persimmon are the same as for SmartFresh™
4. 1-MCP is exempt from the requirements of a tolerance for all fruits and vegetables.

I have enclosed a draft copy of the proposed amended label. The proposed changes to the current EPA-approved label are shown in red. I have also enclosed a copy of the proposed label without the changes highlighted in red.

AgroFresh™


727 Norristown Road, P.O. Box 904, Spring House, PA 19477-0904
www.smartfresh.com • (USA) 866-206-1001 • (INT) +1 215-641-7000

Mr. Driss Benmhend
January 12, 2006

Page 2

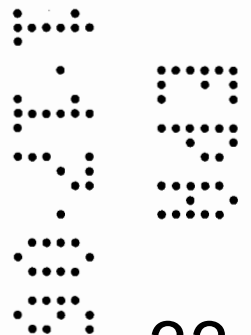
The addition of persimmon to the SmartFresh™ SmartTabs label will be valuable to shippers and packers who wish to treat smaller size storage rooms that can be accommodated by SmartFresh™, the currently registered powder formulation. I would appreciate a rapid review and approval of this amended label. Please forward a copy of the stamped, approved label following EPA approval. Thank you.


Sincerely,



Ann Hecht Beaulieu, Ph.D.

enclosure



 <div style="text-align: center;"> United States Environmental Protection Agency Washington, DC 20460 </div>	<input type="checkbox"/> Registration <input checked="" type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number	

Application for Pesticide - Section I

1. Company/Product Number 71297-3	2. EPA Product Manager Driss Benmhend	3. Proposed Classification None X Restricted
4. Company/Product (Name) SmartFresh™ SmartTabs	PM#	
5. Name and Address of Applicant (Include Zip Code) AgroFresh Inc./Rohm and Haas Company 100 Independence Mall West Philadelphia, PA 19106-2399 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name

Section - II

Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
Notification - Explain below.	<input type="checkbox"/> "Me Too" Application.
	Other - Explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

This amendment is to add persimmon to the label of SmartFresh SmartTabs. No data is required to support this amendment because:

- Persimmon is already approved on the label of SmartFresh (EPA Registration Number 71297-2) which contains the same active ingredient (1-MCP)
- The use pattern for persimmon (postharvest, indoor) and application method is essentially the same as that for SmartFresh.
- The proposed use rate for persimmon; 500 ppb (v/v), and the number of applications (one) are the same as approved for SmartFresh
- 1-MCP has an exemption from the requirements of a tolerance when used as a postharvest treatment for all fruits and vegetables.

Section - III**1. Material This Product Will Be Packaged In:**

Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) Blister Pack								
* Certification must be submitted		<table border="1"> <tr> <td>If "Yes"</td> <td>No. per</td> </tr> <tr> <td>Unit Packaging wgt.</td> <td>container</td> </tr> </table>	If "Yes"	No. per	Unit Packaging wgt.	container	<table border="1"> <tr> <td>If "Yes"</td> <td>No. per</td> </tr> <tr> <td>Package wgt</td> <td>container</td> </tr> </table>	If "Yes"	No. per	Package wgt	container
If "Yes"	No. per										
Unit Packaging wgt.	container										
If "Yes"	No. per										
Package wgt	container										


3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container Blister pack containing ten tablets	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input checked="" type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Ann Hecht Beaulieu	Title Regulatory Director, AgroFresh, Inc.	Telephone No. (Include Area Code) 215-619-5534

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature 	Regulatory Director, AgroFresh, Inc.
--	--------------------------------------

6. Date Application Received

(Stamped)

4. Typed Name

Ann Hecht Beaulieu

5. Date

January 12, 2006

EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete.

White - EPA File Copy (original)

Yellow - Applicant Copy

35

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

NOV 17 2005

AgroFresh Inc./ Rohm and Haas Company
 c/o Mr. Robert H. Larkin
 100 Independence mall West
 Philadelphia, PA 19106-2399

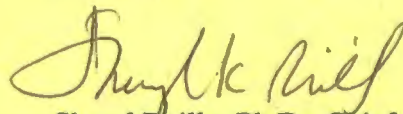
Re: Application to amend label: revise to add kiwi fruit and increase the
 application rate on avocados.
 SmartFresh TM Smart Tabs
 EPA Reg. No. 71297-3
 Your submission of August 17, 2005

Dear Mr. Larkin:

The labeling referred to above, submitted in connection with registration under the authority of Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is **acceptable**. Please submit five (5) copies of your final printed labeling before you release the product for shipment. If this condition is not complied with, the registration will be subjected to cancellation in accordance with FIFRA section 6(e). A stamped copy is enclosed for your records.

Should you have questions concerning this action, please contact Mr. Raderrio Wilkins, the Regulatory Action Leader for this product at (703) 308-1259.

Sincerely,



Sheryl Reilly, Ph.D., Chief
 Biochemical Pesticides Branch
 Biopesticides and Pollution
 Prevention Division (7511C)

Enclosure		CONCURRENCES					
SYMBOL	7511C	7511C					
SURNAME	R. Wilkins	Reilly					
DATE	Nov 1, 2005	11/17/05					

SmartFresh™ SmartTabs	AgroFresh Inc. A subsidiary of Rohm and Haas Company Philadelphia, PA. 19106 Tel: (215) 592-3000
----------------------------------	---

Active Ingredient:

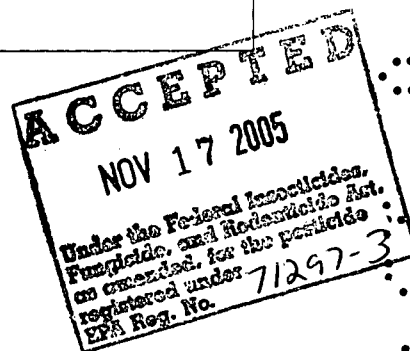
1-Methylcyclopropene..... 0.63%

Other Ingredients: 99.37%

Total: 100.0%

EPA REGISTRATION NO. 71297-3

EPA EST. NO. 707-WA-001



NOTICE: Before using this product, read the entire Precautionary Statements, Conditions of Sale and Warranty, Directions for Use, Use Restrictions and Storage and Disposal Instructions. If the Conditions of Sale and Warranty are not acceptable, return the product and its generating system unopened and unused within thirty days of purchase to the place of purchase.

Keep Out Of Reach Of Children

CAUTION

FIRST AID

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 215-592-3000 for emergency medical treatment information.

Net Contents: 10 tablets (12.5 g)

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Causes slight eye irritation. Harmful if absorbed through skin. Harmful if inhaled. Harmful if swallowed. Avoid contact with skin, eyes or clothing. Avoid breathing vapor. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators of this product must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Safety glasses or goggles

User Safety Recommendations

- Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Applicators and handlers must follow manufacturer's instructions for cleaning / maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling . Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your state or tribe, consult the State or Tribal Agency responsible for pesticide regulation. All applicable directions, restrictions, precautions and conditions of sale and warranty are to be followed. This labeling must be in the user's possession during application.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Workers Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas prior to venting the volatile active ingredient from the treatment room and during the REI of 30 minutes after the room has been vented.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, prior to venting the volatile active ingredient from the treatment room is:

- Coveralls
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P, or HE prefilter.

GENERAL INFORMATION

SmartFresh™ is a unique postharvest tool for counteracting many of the undesirable effects of both internal (produced within the fruit or vegetable) and external sources of ethylene on harvested fruit and vegetables. By counteracting ethylene, SmartFresh™ provides many benefits to the fruit and vegetables during transport and storage including:

- Maintaining firmness
- Maintaining titratable acidity
- Preventing superficial scald and soft scald on apples
- Reducing internal ethylene production
- Protection from external sources of ethylene
- Reducing respiration
- Delaying ripening and senescence
- Reducing incidence of peel greasiness in apples
- Reducing incidence of core flush and mealiness in apples
- Reducing chilling injury

SmartFresh™ can be used immediately after harvest, prior to storage, prior to shipment or just prior to sale. SmartFresh™ is effective under both cool (below 55 °F, 13 °C) and warm (above 55°F, 13°C) temperature conditions. To realize maximum benefit in controlling senescence, treat fruits and vegetables as soon as possible after harvest.

Harvested fruit and vegetables must be exposed to the volatile active ingredient of SmartFresh™ in enclosed areas, such as storage rooms, greenhouses, coolers, shipping containers, enclosed truck trailers, or ambient temperature, refrigerated, or controlled atmosphere food storage facilities. This product is not intended for use outdoors or in other non-enclosed areas. These enclosed treatment areas must be gas tight as leakage will reduce SmartFresh™'s effectiveness.

Fruit And Vegetable Storage Conditions

SmartFresh™ is compatible with and complementary to both controlled atmosphere and regular air fruit and vegetable storage conditions. SmartFresh™ must be used in air tight storage areas.

Timing of Application

SmartFresh™ can be added to the storage area containing fruit or vegetables immediately after harvest, upon entering storage, during distribution or in transit. After application, fruit or vegetables not for immediate sale must be stored according to good standard commercial practices. It must be emphasized that maintaining the cold chain (keeping the fruit and vegetables cool at all times) and strict adherence to phytosanitary practices remain essential in maintaining safe and high quality fruit and vegetables.

Apples: Apply SmartFresh™ soon after harvest. Best results are obtained when fruit is at the optimum maturity level for long term storage. For optimum quality, store apples that are to be held longer than six months in a controlled atmosphere.

Avocados: Apply SmartFresh™ to the fruit soon after harvest at the physiological maturity stage or just prior to the “turning black” stage.

Bananas: Apply SmartFresh™ after the bananas have been exposed to ethylene and prior to reaching color stage 4.

Broccoli: Apply SmartFresh™ as soon after harvest as possible.

Kiwifruit: Apply SmartFresh™ either as soon after harvest as possible or after long term storage and before the fruit are transported and distributed. Do not make more than one application to the same fruit.

Melons: Apply SmartFresh™ as soon after harvest as possible.

Tomatoes: Apply SmartFresh™ between color stage mature green (Color Stage 1) and light red (Color Stage 5).

Application Method

Prior to application, ensure that the treatment area can be properly and promptly sealed following application. SmartFresh™ SmartTabs are used in conjunction with the SmartFresh™ Activator Kit. SmartFresh™ SmartTabs are **Green** tablets that, when mixed with **Blue** Activator Tablets in a proprietary Activator Solution, release the volatile active ingredient 1-methylcyclopropene (1-MCP). Make sure that you have a sufficient supply of both SmartFresh™ SmartTabs and SmartFresh™ Activator Kits available to treat your selected treatment area.

Step 1: Selection of the appropriate number of SmartTabs and SmartTab Activator Kits for use

a.) Accurately determine the volume of your EMPTY treatment area in cubic feet. Multiply inside dimensions: volume = length X width X height.

b.) Choose the correct number of **Green** SmartFresh™ SmartTabs from Table 1 below according to the size of the area and the crop to be treated.

Table 1. Number of **Green** SmartTabs Required

Volume of Treatment Area ft ³	Banana	Melon Tomato	Apple Avocado Broccoli
706 to 882	2	3	6
883 to 1058	3	4	8
1059 to 1235	3	5	9
1236 to 1412	4	6	11
1413 to 1588	4	6	12
1589 to 1765	5	7	14
1766 to 1941	5	8	15
1942 to 2118	5	9	17
2119 to 2294	6	9	19
2295 to 2471	6	10	20
2472 to 2648	7	11	22
2649 to 2824	7	12	23
2825 to 3001	8	12	25
3002 to 3177	8	13	26
3178 to 3354	9	14	28
3355 to 3530	9	15	29
3531 to 3707	9	15	31
3708 to 3884	10	16	32
3885 to 4060	10	17	34
4061 to 4237	11	18	36
4238 to 4413	11	18	37
4414 to 4590	12	19	39
4591 to 4766	12	20	40
4767 to 4943	13	21	42
4944 to 5120	13	21	43
5121 to 5296	14	22	45

Never use more than ten (10) **Green** SmartFresh™ SmartTabs per activator kit. If more than ten (10) **Green** SmartFresh™ SmartTabs are needed, you must divide them among two (2) or more SmartFresh™ Activator Kits. Each Kit activates up to 10 SmartFresh™ SmartTabs only.

Always use two (2) Blue tablets for EACH Release Kit.

Table 1. Number of **Green** SmartTabs Required
Continued

Volume of Treatment Area ft ³	Banana	Melon Tomato	Apple Avocado Broccoli
5297 to 5473	14	23	46
5474 to 5649	14	24	48
5650 to 5826	15	24	49
5827 to 6002	15	25	51
6003 to 6179	16	26	53
6180 to 6356	16	27	54
6357 to 6532	17	27	56
6533 to 6709	17	28	57
6710 to 6885	18	29	59
6886 to 7062	18	30	60
7063 to 7239	18	30	62
7240 to 7415	19	31	63
7416 to 7592	19	32	65
7593 to 7768	20	33	67
7769 to 7945	20	33	68
7946 to 8121	21	34	70
8122 to 8298	21	35	71
8299 to 8475	22	36	73
8476 to 8651	22	37	74
8652 to 8828	23	37	76
8829 to 9004	23	38	77
9005 to 9181	23	39	79
9182 to 9357	24	39	80
9358 to 9534	24	40	82
9535 to 9711	25	41	84
9712 to 9887	25	42	85
9888 to 10064	26	42	87
10065 to 10240	26	43	88
10241 to 10417	27	44	90
10418 to 10593	27	45	91
10594 to 10770	27	45	93
10771 to 10947	28	46	94

Never use more than ten (10) **Green** SmartFresh™ SmartTabs per activator kit. If more than ten (10) **Green** SmartFresh™ SmartTabs are needed, you must divide them among two (2) or more SmartFresh™ Activator Kits. Each Kit activates up to 10 SmartFresh™ SmartTabs only.

Always use two (2) Blue tablets for EACH Release Kit.

Step 2. Evaluation Of The Quality Of The Treatment Room / Trailer / Container

To be used with SmartFresh™, rooms/containers/trailers must be gas tight and have an internal fan for mixing the atmosphere.

Check that:

- All Room/Trailer/Container drain holes are plugged
- There are no holes in the walls, ceiling, or floor
- All vents to outside air are closed
- When viewed from a dark interior, no outside light is visible
- Door seals are in EXCELLENT condition
 - No missing rubber No large cracks
 - No plastic slat doors No roller top doors
 - No side doors
- Scrubbers and/or ozone generators are off

Step 3: Fill the treatment room with the fruit or vegetables to be treated

Step 4: Release of 1-MCP

- a) Remove the pack of two (2) Blue SmartFresh™ Activator Tablets from the foam block.
Always use both Blue tablets.
- b) Remove the appropriate number of **Green** SmartTabs from the SmartFresh™ SmartTabs Package.
- c) Peel off the foil seal from the SmartFresh™ Activator Solution taking care not to spill the solution.
- d) Add both the **Blue** and **Green** Tablets to the Activator Solution.
- e) Replace the cap.
- f) Place the small container on a level surface e.g. in the bottom gap of the pallet. Keep the container upright.
- g) Exit the treatment room immediately and promptly close the doors and ensure they are tightly sealed in order to contain the SmartFresh™ and ensure its maximum efficacy. The release of SmartFresh™ to the area will start several minutes after addition of the SmartTabs to the Activator Solution.
- h) Circulate air in the room by means of the internal air circulation system for AT LEAST one (1) hour.
- i) Do not open the doors for AT LEAST twelve (12) hours.
- j) For controlled atmosphere storage containers or storage rooms, do not change the room atmosphere to controlled atmosphere conditions for AT LEAST twelve (12) hours.

Step 5: Reentry To The Storage Area

At the end of the SmartFresh™ treatment period, vent the treated room by opening the doors for a minimum of thirty minutes with continued full internal ventilation before allowing workers to enter. At the end of the room venting, remove the SmartFresh™ Activator Solution and dispose of it as non-hazardous waste on-site or at an approved waste disposal facility. Store treated fruit and vegetables not intended for immediate sale according to standard commercial practices, in either refrigerated air or controlled atmosphere conditions.

Restrictions

Maximum season use rate: One application with appropriate number of tablets

Do not smoke during the SmartFresh™ application.

Do not treat fruit or vegetables stressed from poor fertility, heat, drought or sunscald.

Do not treat fruit that have had a pre-harvest application of ethephon.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in original packaging in a cool, dry place.

Pesticide Disposal: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse or equivalent. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

CONDITIONS OF SALE AND WARRANTY

AgroFresh Inc. warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label only when used in accordance with label directions under normal conditions of use. AgroFresh Inc. **MAKES NO OTHER EXPRESS OR IMPLIED WARRANTIES EITHER OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE.** Handling, storage and use of the product by Buyer or User are beyond the control of AgroFresh Inc. and Seller. Risks such as crop injury, ineffectiveness or other unintended consequences resulting from, but not limited to, weather or soil conditions, presence of other materials, disease, pests, drift to other crops or property, or failure to follow label directions will be assumed by the Buyer or User. **TO THE FULLEST EXTENT PERMITTED BY LAW, AgroFresh Inc. OR SELLER SHALL NOT BE HELD LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE HANDLING, STORAGE OR USE OF THIS PRODUCT**

SmartFresh™ is a registered trademark of AgroFresh, Inc./Rohm and Haas Company

AgroFresh Inc.
A Fully-Owned Subsidiary of Rohm and Haas Company
100 Independence Mall West
Philadelphia, PA. 19106
(215) 592-3000



United States
Environmental Protection Agency
 Washington, DC 20460

X	Registration	OPP Identifier Number
	Amendment	
	Other	

Application for Pesticide - Section I

1. Company/Product Number 71297-3	2. EPA Product Manager Driss Benmhend	3. Proposed Classification None X Restricted
4. Company/Product (Name) SmartFresh™ SmartTabs	PM#	
5. Name and Address of Applicant (Include Zip Code) AgroFresh Inc./Rohm and Haas Company 100 Independence Mall West Philadelphia, PA 19106-2399 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name

Section - II

Amendment - Explain below.

☐

Final printed labels in response to Agency letter dated _____

☐

"Me Too" Application.

Notification - Explain below.

Other - Explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

This amendment is to add kiwifruit to the label of SmartFresh SmartTabs and to increase the application rate on avocados. No data is required to support this amendment because:

1. Kiwifruit are already approved on the label of SmartFresh (EPA Registration Number 71297-2) which contains the same active ingredient (1-MCP)
2. The use pattern for kiwifruit (postharvest, indoor) and application method is essentially the same as that for SmartFresh.
3. The proposed use rate for kiwifruit, 500 ppb (v/v), and the number of applications (one) are the same as approved for SmartFresh
4. The proposed use rate for avocados, 1000 ppb, is the same as that already approved for use on apples
5. 1-MCP has an exemption from the requirements of a tolerance when used as a postharvest treatment for all fruits and vegetables.

Section - III

Material This Product Will Be Packaged In:

Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Package wgt. container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) Blister Pack
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* Certification must be submitted

3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container Blister pack containing ten tablets	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input checked="" type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Robert H. Larkin	Title President, Regulatory Solutions, LLC	Telephone No. (Include Area Code) 215-284-5702


Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received

(Stamped)

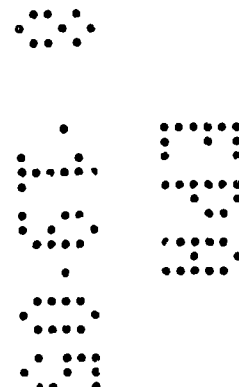
47

2. Signature 	3. Title President, Regulatory Solutions, LLC
4. Typed Name Robert H. Larkin	5. Date August 17, 2005

EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete.

White - EPA File Copy (original)

Yellow - Applicant Copy



August 17, 2005

Mr. Driss Benmhend
Office Of Pesticide Programs (7511C)
Biopesticides and Pollution Prevention Division
U.S. Environmental Protection Agency
Room 910, Crystal Mall 2
1801 South Bell Street
Arlington, VA 22202-4501

Dear Mr. Benmhend:

Re: SmartFresh™ SmartTabs
EPA Registration Number 71297-3
Active Ingredient = 1-methylcyclopropene
Amendment to Add Kiwifruit to the Label and to Increase the Use Rate
For Avocados

Enclosed is an application to amend the label of SmartFresh™ SmartTabs by:

1. Adding kiwifruit to the label.
2. Increasing the application rate for use on avocados to 1000 ppb (v/v) from the currently approved rate of 300 ppb (v/v).

No data are required to support this amendment since:

1. Kiwifruit are already approved for use on the label of SmartFresh™ (EPA Registration Number 71297-2), a powder formulation of the same active ingredient, 1-methylcyclopropene.
2. The use rate for kiwifruit, 500 ppb (v/v), and number of applications (1) are the same as prescribed on the SmartFresh™ label
3. The use pattern (indoor, postharvest) and method of application for kiwifruit are the same as for SmartFresh™
4. The proposed increased use rate for avocados is the same as the maximum use rate already approved for use on apples
5. 1-MCP is exempt from the requirements of a tolerance for all fruits and vegetables.

Agro Fresh™

727 Norristown Road, P.O. Box 904, Spring House, PA 19477-0904
www.smartfresh.com • (USA) 866-206-1001 • (INT) +1 215-641-7000

Mr. Driss Benmhend
August 17, 2005

Page 2

I have enclosed a draft copy of the proposed amended label. The proposed changes to the current EPA-approved label are shown in red. I have also enclosed a copy of the proposed label without the changes highlighted in red.

The addition of kiwifruit to the SmartFresh™ SmartTabs label will be valuable to shippers and packers who wish to treat smaller size storage rooms that can be accommodated by SmartFresh™, the currently registered powder formulation. The increase in use rate for avocados is necessary for the treatment of late harvested avocados which do not respond as effectively to the 300 ppb (v/v) application rate. I would appreciate a rapid review and approval of this amended label. Please forward a copy of the stamped, approved label following EPA approval. Thank you.

Sincerely,

A handwritten signature in blue ink that reads "Robert H. Larkin, Ph.D." The signature is written in a cursive style.

Robert H. Larkin, Ph.D.

enclosures

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SEP 08 2005

783066	300
78	17

Dr. Robert H. Larkin
 AgroFresh Inc.
 c/o Rohm and Haas Company
 100 Independence Mall West
 Philadelphia, PA 19105

Re: Resubmission of Label Amendment to add "Broccoli": Application Dated 8/9/05
EPA Registration Number: 71297-3
Product Name: Smart Fresh™ Smart Tabs

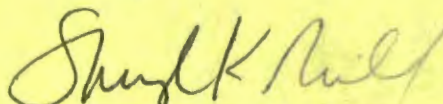
Dear Dr. Larkin:

The amendment referred to above, submitted in connection with registration under FIFRA section 3(c)(7)(A), is acceptable provided that you:

1. Submit and/or cite all data required for registration/reregistration of your product under FIFRA section 3(c)(5) when the Agency requires all registrants of similar products to submit such data.
2. Submit five (5) copies of your final printed labeling before you release the product for shipment. Final printed labeling means the label or labeling of the product when distributed or sold. Clearly legible reproductions or photo reductions will be accepted for unusual labels, such as those silk-screened directly onto glass or metal containers or large bags or drum labels. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

Sincerely,



Sheryl K. Reilly, Ph.D., Chief
 Biochemical Pesticides Branch
 Biopesticides and Pollution

Enclosure

Prevention Division (7511C)

SYMBOL	7511C	7511C	7511C				
SURNAME	Gibbons	Peter	Reilly				
DATE	8/24/05	8/31/05	9-2-05				

SmartFresh™ SmartTabs	AgroFresh Inc. A subsidiary of Rohm and Haas Company Philadelphia, PA. 19106 Tel: (215) 592-3000
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Active Ingredient:

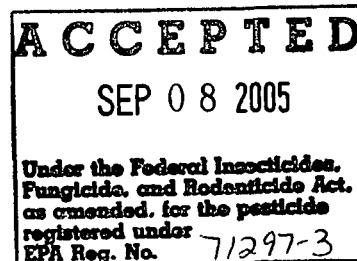
1-Methylcyclopropene.....0.63%

Other Ingredients:.....99.37%

Total:100.0%

EPA REGISTRATION NO. 71297-3

EPA EST. NO. 707-WA-001



NOTICE: Before using this product, read the entire Precautionary Statements, Conditions of Sale and Warranty, Directions for Use, Use Restrictions and Storage and Disposal Instructions. If the Conditions of Sale and Warranty are not acceptable, return the product and its generating system unopened and unused within thirty days of purchase to the place of purchase.

Keep Out Of Reach Of Children

CAUTION

FIRST AID

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 215-592-3000 for emergency medical treatment information.

Net Contents: 10 tablets, 0.44 ounces (12.5 g)

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Causes slight eye irritation. Harmful if absorbed through skin. Harmful if inhaled. Harmful if swallowed. Avoid contact with skin, eyes or clothing. Avoid breathing vapor. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators of this product must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Safety glasses or goggles

User Safety Recommendations

- Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Applicators and handlers must follow manufacturer's instructions for cleaning / maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your state or tribe, consult the State or Tribal Agency responsible for pesticide regulation. All applicable directions, restrictions, precautions and conditions of sale and warranty are to be followed. This labeling must be in the user's possession during application.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Workers Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas prior to venting the volatile active ingredient from the treatment room and during the REI of 30 minutes after the room has been vented.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, prior to venting the volatile active ingredient from the treatment room is:

- Coveralls
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P, or HE prefilter.

GENERAL INFORMATION

SmartFresh™ is a unique postharvest tool for counteracting many of the undesirable effects of both internal (produced within the fruit or vegetable) and external sources of ethylene on harvested fruit and vegetables. By counteracting ethylene, SmartFresh™ provides many benefits to the fruit and vegetables during transport and storage including:

- Maintaining firmness
- Maintaining titratable acidity
- Preventing superficial scald and soft scald on apples
- Reducing internal ethylene production
- Protection from external sources of ethylene
- Reducing respiration
- Delaying ripening and senescence
- Reducing incidence of peel greasiness in apples
- Reducing incidence of core flush and mealiness in apples
- Reducing chilling injury

SmartFresh™ can be used immediately after harvest, prior to storage, prior to shipment or just prior to sale. SmartFresh™ is effective under both cool (below 55 °F, 13 °C) and warm (above 55°F, 13°C) temperature conditions. To realize maximum benefit in controlling senescence, treat fruits and vegetables as soon as possible after harvest.

Harvested fruit and vegetables must be exposed to the volatile active ingredient of SmartFresh™ in enclosed areas, such as storage rooms, greenhouses, coolers, shipping containers, enclosed truck trailers, or ambient temperature, refrigerated, or controlled atmosphere food storage facilities. This product is not intended for use outdoors or in other non-enclosed areas. These enclosed treatment areas must be gas tight as leakage will reduce SmartFresh™'s effectiveness.

Fruit And Vegetable Storage Conditions

SmartFresh™ is compatible with and complementary to both controlled atmosphere and regular air fruit and vegetable storage conditions. SmartFresh™ must be used in air tight storage areas.

Timing of Application

SmartFresh™ can be added to the storage area containing fruit or vegetables immediately after harvest, upon entering storage, during distribution or in transit. After application, fruit or vegetables not for immediate sale must be stored according to good standard commercial practices. It must be emphasized that maintaining the cold chain (keeping the fruit and vegetables cool at all times) and strict adherence to phytosanitary practices remain essential in maintaining safe and high quality fruit and vegetables.

Apples: Apply SmartFresh™ soon after harvest. Best results are obtained when fruit is at the optimum maturity level for long term storage. For optimum quality, store apples that are to be held longer than six months in a controlled atmosphere.

Avocados: Apply SmartFresh™ to the fruit soon after harvest at the physiological maturity stage or just prior to the "turning black" stage.

Bananas: Apply SmartFresh™ after the bananas have been exposed to ethylene and prior to reaching color stage 4.

Broccoli: Apply SmartFresh™ as soon after harvest as possible.

Melons: Apply SmartFresh™ as soon after harvest as possible.

Tomatoes: Apply SmartFresh™ between color stage mature green (Color Stage 1) and light red (Color Stage 5).

Application Method

Prior to application, ensure that the treatment area can be properly and promptly sealed following application. SmartFresh™ SmartTabs are used in conjunction with the SmartFresh™ Activator Kit. SmartFresh™ SmartTabs are **Green** tablets that, when mixed with **Blue** Activator Tablets in a proprietary Activator Solution, release the volatile active ingredient 1-methylcyclopropene (1-MCP). Make sure that you have a sufficient supply of both SmartFresh™ SmartTabs and SmartFresh™ Activator Kits available to treat your selected treatment area.

Step 1: Selection of the appropriate number of SmartTabs and SmartTab Activator Kits for use

- a.) Accurately determine the volume of your EMPTY treatment area in cubic feet. Multiply inside dimensions: volume = length X width X height.
- b.) Choose the correct number of **Green** SmartFresh™ SmartTabs from Table 1 below according to the size of the area and the crop to be treated.

Table 1. Number of **Green** SmartTabs Required

Volume of Treatment Area ft ³	Avocado Banana	Melon Tomato	Apple Broccoli
706 to 882	2	3	6
883 to 1058	3	4	8
1059 to 1235	3	5	9
1236 to 1412	4	6	11
1413 to 1588	4	6	12
1589 to 1765	5	7	14
1766 to 1941	5	8	15
1942 to 2118	5	9	17
2119 to 2294	6	9	19
2295 to 2471	6	10	20
2472 to 2648	7	11	22
2649 to 2824	7	12	23
2825 to 3001	8	12	25
3002 to 3177	8	13	26
3178 to 3354	9	14	28
3355 to 3530	9	15	29
3531 to 3707	9	15	31
3708 to 3884	10	16	32
3885 to 4060	10	17	34
4061 to 4237	11	18	36
4238 to 4413	11	18	37
4414 to 4590	12	19	39
4591 to 4766	12	20	40
4767 to 4943	13	21	42
4944 to 5120	13	21	43
5121 to 5296	14	22	45

Never use more than ten (10) **Green** SmartFresh™ SmartTabs per activator kit. If more than ten (10) **Green** SmartFresh™ SmartTabs are needed, you must divide them among two (2) or more SmartFresh™ Activator Kits. Each Kit activates up to 10 SmartFresh™ SmartTabs only.

Always use two (2) Blue tablets for EACH Release Kit.

Table 1. Number of **Green** SmartTabs Required
Continued

Volume of Treatment Area ft ³	Avocado Banana	Melon Tomato	Apple Broccoli
5297 to 5473	14	23	46
5474 to 5649	14	24	48
5650 to 5826	15	24	49
5827 to 6002	15	25	51
6003 to 6179	16	26	53
6180 to 6356	16	27	54
6357 to 6532	17	27	56
6533 to 6709	17	28	57
6710 to 6885	18	29	59
6886 to 7062	18	30	60
7063 to 7239	18	30	62
7240 to 7415	19	31	63
7416 to 7592	19	32	65
7593 to 7768	20	33	67
7769 to 7945	20	33	68
7946 to 8121	21	34	70
8122 to 8298	21	35	71
8299 to 8475	22	36	73
8476 to 8651	22	37	74
8652 to 8828	23	37	76
8829 to 9004	23	38	77
9005 to 9181	23	39	79
9182 to 9357	24	39	80
9358 to 9534	24	40	82
9535 to 9711	25	41	84
9712 to 9887	25	42	85
9888 to 10064	26	42	87
10065 to 10240	26	43	88
10241 to 10417	27	44	90
10418 to 10593	27	45	91
10594 to 10770	27	45	93
10771 to 10947	28	46	94

Never use more than ten (10) **Green** SmartFresh™ SmartTabs per activator kit.
If more than ten (10) **Green** SmartFresh™ SmartTabs are needed, you must divide them among two (2) or more SmartFresh™ Activator Kits. Each Kit activates up to 10 SmartFresh™ SmartTabs only.

Always use two (2) Blue tablets for EACH Release Kit.

Step 2. Evaluation Of The Quality Of The Treatment Room / Trailer / Container

To be used with SmartFresh™, rooms/containers/trailers must be gas tight and have an internal fan for mixing the atmosphere.

Check that:

- All Room/Trailer/Container drain holes are plugged
- There are no holes in the walls, ceiling, or floor
- All vents to outside air are closed
- When viewed from a dark interior, no outside light is visible
- Door seals are in EXCELLENT condition
 - No missing rubber No large cracks
 - No plastic slat doors No roller top doors
 - No side doors
- Scrubbers and/or ozone generators are off

Step 3: Fill the treatment room with the fruit or vegetables to be treated

Step 4: Release of 1-MCP

- a) Remove the pack of two (2) Blue SmartFresh™ Activator Tablets from the foam block.
Always use both Blue tablets.
- b) Remove the appropriate number of **Green** SmartTabs from the SmartFresh™ SmartTabs Package.
- c) Peel off the foil seal from the SmartFresh™ Activator Solution taking care not to spill the solution.
- d) Add both the **Blue** and **Green** Tablets to the Activator Solution.
- e) Replace the cap.
- f) Place the small container on a level surface e.g. in the bottom gap of the pallet. Keep the container upright.
- g) Exit the treatment room immediately and promptly close the doors and ensure they are tightly sealed in order to contain the SmartFresh™ and ensure its maximum efficacy. The release of SmartFresh™ to the area will start several minutes after addition of the SmartTabs to the Activator Solution.
- h) Circulate air in the room by means of the internal air circulation system for AT LEAST one (1) hour.
- i) Do not open the doors for AT LEAST twelve (12) hours.
- j) For controlled atmosphere storage containers or storage rooms, do not change the room atmosphere to controlled atmosphere conditions for AT LEAST twelve (12) hours.

Step 5: Reentry To The Storage Area

At the end of the SmartFresh™ treatment period, vent the treated room by opening the doors for a minimum of thirty minutes with continued full internal ventilation before allowing workers to

enter. At the end of the room venting, remove the SmartFresh™ Activator Solution and dispose of it as non-hazardous waste on-site or at an approved waste disposal facility. Store treated fruit and vegetables not intended for immediate sale according to standard commercial practices, in either refrigerated air or controlled atmosphere conditions.

Restrictions

Maximum season use rate: One application with appropriate number of tablets

Do not smoke during the SmartFresh™ application.

Do not treat fruit or vegetables stressed from poor fertility, heat, drought or sunscald.

Do not treat fruit that have had a pre-harvest application of ethephon.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in original packaging in a cool, dry place.

Pesticide Disposal: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse or equivalent. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

CONDITIONS OF SALE AND WARRANTY

AgroFresh Inc. warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label only when used in accordance with label directions under normal conditions of use. AgroFresh Inc. **MAKES NO OTHER EXPRESS OR IMPLIED WARRANTIES EITHER OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE.** Handling, storage and use of the product by Buyer or User are beyond the control of AgroFresh Inc. and Seller. Risks such as crop injury, ineffectiveness or other unintended consequences resulting from, but not limited to, weather or soil conditions, presence of other materials, disease, pests, drift to other crops or property, or failure to follow label directions will be assumed by the Buyer or User. **TO THE FULLEST EXTENT PERMITTED BY LAW, AgroFresh Inc. OR SELLER SHALL NOT BE HELD LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE HANDLING, STORAGE OR USE OF THIS PRODUCT**

SmartFresh™ is a registered trademark of AgroFresh, Inc./Rohm and Haas Company

AgroFresh Inc.
A Fully-Owned Subsidiary of Rohm and Haas Company
100 Independence Mall West
Philadelphia, PA. 19106
(215) 592-3000

EPA Reg. No.: 71297-3
 RAL: T. Gibbons

BPPD Label Amendment Check List

Application Date: 8/9/05
Internal BBPD Guidance Document - Other Items May be Required Updated 7/02

No.	Check List Item	Yes	No
1.	Application Form (EPA Form 8570-1) -signed & complete including package type? If NO, STOP! Call applicant and have them correct application and resubmit.	✓	
1a.	Fast-Track?	✓	
2.	Amendment covered by PR Notice 98-10 (Notifications)? If YES, STOP. Call applicant and inform them that this submission will be converted to a notification. After closing out in PRATS, forward to Notification Review Coordinator.		✓
3.	Final printed labeling received for previous action? If NO, Stop! E-mail applicant and request final printed labeling (FPL). Inform them that FPL from the last accepted label is needed to support the current application. File e-mail as record of notification. Log out of PRATS (label deficiency).	✓	
4.	Data and Data Matrix (EPA Form 8570-35)		NA
	a) using Selective Method? [If NO, (Data Matrix not required), skip to Item 5.]		
	1) Complete Data Matrix. Minimum Data Matrix for registration includes: Product specific acute tox and product chemistry data, plus Efficacy data for Public Health pests claimed on label.		
	b) Adequate Product Specific data		
	c) Registered source used for active ingredient? If Yes, active ingredient is from a registered source and generic data should be satisfied by registered source. Skip to Item 5. If No, generic data is necessary.		
	d) Data passed 86-52? (Data formatting PR Notice)		
	e) Public copy of Matrix provided? (As required by PRN 98-5)		
5.	Certification with Respect to Citation of Data (EPA Form 8570-34) See 40 CFR 152.80-98 and PR Notice 98-5 [Note: If no data are required or submitted, a Certification with Respect to Citation of Data form is not needed. This is often true for minor amendments.]		NA
	a) Did applicant check a Method of Support?		
	b) General Offer to Pay checked for Cite-all Method or Cite-all under Selective Method?		
	c) Is the form signed and dated?		
	d) Check form and Data Matrix; are Exclusive Use data cited from other sources?		
	1.) If Yes, is the required authorization letter included in application?		
6.	Label(s) Review Date of Label Review: <u>8/23/05</u> Bob Torla Concurrence for OMRI Logo: <u>required</u>		
a.	Label(s) agrees with current Label Review Manual and appropriate REDS	✓	
b.	Labeling from acute tox, product chemistry, and efficacy data (Public Health pests)	✓	
c.	Nominal concentration of active ingredient shown in ingredients statement	✓	
d.	Viability included as substatement of Ingredient Statement (if live microbial, e.i., cfu/gram)	NA	
e.	Storage and disposal instructions agree with container types listed on application form	✓	
f.	Unique Product Name for Same Company (Check REFS)	✓	
g.	Labeling is acceptable. Corrections or changes are NOT necessary.	✓	

SmartFresh™ SmartTabs	AgroFresh Inc. A subsidiary of Rohm and Haas Company Philadelphia, PA. 19106 Tel: (215) 592-3000
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Active Ingredient:

1-Methylcyclopropene.. 0.63%

Other Ingredients: 99.37%

Total: 100.0%

EPA REGISTRATION NO. 71297-3

EPA EST. NO. 707-WA-001

NOTICE: Before using this product, read the entire Precautionary Statements, Conditions of Sale and Warranty, Directions for Use, Use Restrictions and Storage and Disposal Instructions. If the Conditions of Sale and Warranty are not acceptable, return the product and its generating system unopened and unused within thirty days of purchase to the place of purchase.

Keep Out Of Reach Of Children

CAUTION

FIRST AID

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. **You may also contact 215-592-3000 for emergency medical treatment information.**

Net Contents: 10 tablets (12.5 g)

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Causes slight eye irritation. Harmful if absorbed through skin. **Harmful if inhaled. Harmful if swallowed. Avoid contact with skin, eyes or clothing.** Avoid breathing vapor. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators of this product must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Safety glasses or goggles

User Safety Recommendations

- Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Applicators and handlers must follow manufacturer's instructions for cleaning / maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling . Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your state or tribe, consult the **State or Tribal Agency** responsible for pesticide regulation. All applicable directions, restrictions, precautions and conditions of sale and warranty are to be followed. This labeling must be in the user's possession during application.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Workers Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas prior to venting the volatile active ingredient from the treatment room and during the REI of 30 minutes after the room has been vented.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, prior to venting the volatile active ingredient from the treatment room is:

- Coveralls
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P, or HE prefilter.

GENERAL INFORMATION

SmartFresh™ is a unique postharvest tool for counteracting many of the undesirable effects of both internal (produced within the fruit or vegetable) and external sources of ethylene on harvested fruit and vegetables. By counteracting ethylene, SmartFresh™ provides many benefits to the fruit and vegetables during transport and storage including:

- Maintaining firmness
- Maintaining titratable acidity
- Preventing superficial scald and soft scald on apples
- Reducing internal ethylene production
- Protection from external sources of ethylene
- Reducing respiration
- Delaying ripening and senescence
- Reducing incidence of peel greasiness in apples
- Reducing incidence of core flush and mealiness in apples
- Reducing chilling injury

SmartFresh™ can be used immediately after harvest, prior to storage, prior to shipment or just prior to sale. SmartFresh™ is effective under both cool (below 55 °F, 13 °C) and warm (above 55°F, 13°C) temperature conditions. To realize maximum benefit in controlling senescence, **treat** fruits and vegetables as soon as possible after harvest.

Harvested fruit and vegetables must be exposed to the volatile active ingredient of SmartFresh™ in enclosed areas, such as storage rooms, greenhouses, coolers, shipping containers, enclosed truck trailers, or ambient temperature, refrigerated, or controlled atmosphere food storage facilities. This product is not intended for use outdoors or in other non-enclosed areas. These enclosed treatment areas **must** be gas tight as leakage will reduce SmartFresh™'s effectiveness.

Fruit And Vegetable Storage Conditions

SmartFresh™ is compatible with and complementary to both controlled atmosphere and regular air fruit and vegetable storage conditions. SmartFresh™ must be used in air tight storage areas.

Timing of Application

SmartFresh™ can be added to the storage area containing fruit or vegetables immediately after harvest, upon entering storage, during distribution or in transit. After application, fruit or vegetables not for immediate sale must be stored according to good standard commercial practices. It must be emphasized that maintaining the cold chain (keeping the fruit and vegetables cool at all times) and strict adherence to phytosanitary practices remain essential in maintaining safe and high quality fruit and vegetables.

Apples: Apply SmartFresh™ soon after harvest. Best results are obtained when fruit is at the optimum maturity level for long term storage. For optimum quality, store apples that are to be held longer than six months in a controlled atmosphere.

Avocados: Apply SmartFresh™ to the fruit soon after harvest at the physiological maturity stage or just prior to the "turning black" stage.

Bananas: Apply SmartFresh™ after the bananas have been exposed to ethylene and prior to reaching color stage 4.

Broccoli: Apply SmartFresh™ as soon after harvest as possible.

Melons: Apply SmartFresh™ as soon after harvest as possible.

Tomatoes: Apply SmartFresh™ between color stage mature green (Color Stage 1) and light red (Color Stage 5).

Application Method

Prior to application, ensure that the treatment area can be properly and promptly sealed following application. SmartFresh™ SmartTabs are used in conjunction with the SmartFresh™ Activator Kit. SmartFresh™ SmartTabs are **Green** tablets that, when mixed with **Blue** Activator Tablets in a proprietary Activator Solution, release the volatile active ingredient 1-methylcyclopropene (1-MCP). Make sure that you have a sufficient supply of both SmartFresh™ SmartTabs and SmartFresh™ Activator Kits available to treat your selected treatment area.

Step 1: Selection of the appropriate number of SmartTabs and
SmartTab Activator Kits for use

a.) Accurately determine the volume of your EMPTY treatment area in cubic feet. Multiply inside dimensions: volume = length X width X height.

b.) Choose the correct number of **Green** SmartFresh™ SmartTabs from Table 1 below according to the size of the area and the crop to be treated.

Table 1. Number of **Green** SmartTabs Required

Volume of Treatment Area ft ³	Avocado Banana	Melon Tomato	Apple Broccoli
706 to 882	2	3	6
883 to 1058	3	4	8
1059 to 1235	3	5	9
1236 to 1412	4	6	11
1413 to 1588	4	6	12
1589 to 1765	5	7	14
1766 to 1941	5	8	15
1942 to 2118	5	9	17
2119 to 2294	6	9	19
2295 to 2471	6	10	20
2472 to 2648	7	11	22
2649 to 2824	7	12	23
2825 to 3001	8	12	25
3002 to 3177	8	13	26
3178 to 3354	9	14	28
3355 to 3530	9	15	29
3531 to 3707	9	15	31
3708 to 3884	10	16	32
3885 to 4060	10	17	34
4061 to 4237	11	18	36
4238 to 4413	11	18	37
4414 to 4590	12	19	39
4591 to 4766	12	20	40
4767 to 4943	13	21	42
4944 to 5120	13	21	43
5121 to 5296	14	22	45

Never use more than ten (10) **Green** SmartFresh™ SmartTabs per activator kit. If more than ten (10) **Green** SmartFresh™ SmartTabs are needed, you must divide them among two (2) or more SmartFresh™ Activator Kits. Each Kit activates up to 10 SmartFresh™ SmartTabs only.

Always use two (2) Blue tablets for EACH Release Kit.

Table 1. Number of **Green** SmartTabs Required
Continued

Volume of Treatment Area ft ³	Avocado Banana	Melon Tomato	Apple Broccoli
5297 to 5473	14	23	46
5474 to 5649	14	24	48
5650 to 5826	15	24	49
5827 to 6002	15	25	51
6003 to 6179	16	26	53
6180 to 6356	16	27	54
6357 to 6532	17	27	56
6533 to 6709	17	28	57
6710 to 6885	18	29	59
6886 to 7062	18	30	60
7063 to 7239	18	30	62
7240 to 7415	19	31	63
7416 to 7592	19	32	65
7593 to 7768	20	33	67
7769 to 7945	20	33	68
7946 to 8121	21	34	70
8122 to 8298	21	35	71
8299 to 8475	22	36	73
8476 to 8651	22	37	74
8652 to 8828	23	37	76
8829 to 9004	23	38	77
9005 to 9181	23	39	79
9182 to 9357	24	39	80
9358 to 9534	24	40	82
9535 to 9711	25	41	84
9712 to 9887	25	42	85
9888 to 10064	26	42	87
10065 to 10240	26	43	88
10241 to 10417	27	44	90
10418 to 10593	27	45	91
10594 to 10770	27	45	93
10771 to 10947	28	46	94

Never use more than ten (10) **Green** SmartFresh™ SmartTabs per activator kit.
If more than ten (10) **Green** SmartFresh™ SmartTabs are needed, you must divide them among two (2) or more SmartFresh™ Activator Kits. Each Kit activates up to 10 SmartFresh™ SmartTabs only.

Always use two (2) Blue tablets for EACH Release Kit.

Step 2. Evaluation Of The Quality Of The Treatment Room / Trailer / Container

To be used with SmartFresh™, rooms/containers/trailers must be gas tight and have an internal fan for mixing the atmosphere.

Check that:

- All Room/Trailer/Container drain holes are plugged
- There are no holes in the walls, ceiling, or floor
- All vents to outside air are closed
- When viewed from a dark interior, no outside light is visible
- Door seals are in EXCELLENT condition
 - No missing rubber No large cracks
 - No plastic slat doors No roller top doors
 - No side doors
- Scrubbers and/or ozone generators are off

Step 3: Fill the treatment room with the fruit or vegetables to be treated

Step 4: Release of 1-MCP

- a) Remove the pack of two (2) Blue SmartFresh™ Activator Tablets from the foam block.
Always use both Blue tablets.
- b) Remove the appropriate number of **Green** SmartTabs from the SmartFresh™ SmartTabs Package.
- c) Peel off the foil seal from the SmartFresh™ Activator Solution taking care not to spill the solution.
- d) Add both the **Blue** and **Green** Tablets to the Activator Solution.
- e) Replace the cap.
- f) Place the small container on a level surface e.g. in the bottom gap of the pallet. Keep the container upright.
- g) Exit the treatment room immediately and promptly close the doors and ensure they are tightly sealed in order to contain the SmartFresh™ and ensure its maximum efficacy. The release of SmartFresh™ to the area will start several minutes after addition of the SmartTabs to the Activator Solution.
- h) Circulate air in the room by means of the internal air circulation system for AT LEAST one (1) hour.
- i) Do not open the doors for AT LEAST twelve (12) hours.
- j) For controlled atmosphere storage containers or storage rooms, do not change the room atmosphere to controlled atmosphere conditions for AT LEAST twelve (12) hours.

Step 5: Reentry To The Storage Area

At the end of the SmartFresh™ treatment period, vent the treated room by opening the doors for a minimum of thirty minutes with continued full internal ventilation before allowing workers to

enter. At the end of the room venting, remove the SmartFresh™ Activator Solution and dispose of it as non-hazardous waste on-site or at an approved waste disposal facility. **Store** treated fruit and vegetables not intended for immediate sale according to standard commercial practices, in either refrigerated air or controlled atmosphere conditions.

Restrictions

Maximum season use rate: One application with appropriate number of tablets

Do not smoke during the SmartFresh™ application.

Do not treat fruit or vegetables stressed from poor fertility, heat, drought or sunscald.

Do not treat fruit that have had a pre-harvest application of ethephon.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in original packaging in a cool, dry place.

Pesticide Disposal: Wastes resulting from the use of this product **must** be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse or equivalent. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

CONDITIONS OF SALE AND WARRANTY

AgroFresh Inc. warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label only when used in accordance with label directions under normal conditions of use. AgroFresh Inc. **MAKES NO OTHER EXPRESS OR IMPLIED WARRANTIES EITHER OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE.** Handling, storage and use of the product by Buyer or User are beyond the control of AgroFresh Inc. and Seller. Risks such as crop injury, ineffectiveness or other unintended consequences resulting from, but not limited to, weather or soil conditions, presence of other materials, disease, pests, drift to other crops or property, or failure to follow label directions will be assumed by the Buyer or User. **TO THE FULLEST EXTENT PERMITTED BY LAW, AgroFresh Inc. OR SELLER SHALL NOT BE HELD LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE HANDLING, STORAGE OR USE OF THIS PRODUCT**

SmartFresh™ is a registered trademark of AgroFresh, Inc./Rohm and Haas Company

AgroFresh Inc.
A Fully-Owned Subsidiary of Rohm and Haas Company
100 Independence Mall West
Philadelphia, PA. 19106
(215) 592-3000

August 15, 2005

Ms. Tasha Gibbons
Office Of Pesticide Programs (7511C)
Biopesticides and Pollution Prevention Division
U.S. Environmental Protection Agency
Room 910, Crystal Mall 2
1801 South Bell Street
Arlington, VA 22202-4501

Dear Ms. Gibbons:

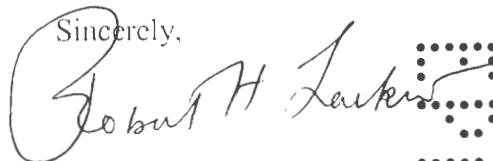
Re: SmartFresh™ SmartTabs
EPA Registration Number 71297-3
Active Ingredient – 1-methylcyclopropene
Amendment to Add Broccoli to the Label
Response to EPA letter of July 21, 2005

Enclosed is an application form and revised labels that have incorporated the recommendations made in the letter from Sheryl Reilly dated July 21, 2005. In one of the labels, I have indicated the recent changes in red for your ease of review. The red highlighting is removed from the second label.

As you requested, I have also enclosed a copy of the current, final printed label for SmartFresh™ SmartTabs.

I would appreciate a rapid review and approval of this amended label. Please forward a copy of the stamped, approved label following EPA approval. Thank you.

Sincerely,



Robert H. Larkin, Ph.D.

AgroFresh™

727 Norristown Road, P.O. Box 904, Spring House, PA 19477-0904
www.smartfresh.com • (USA) 866-206-1001 • (INT) +1 215-641-7000

SmartFresh™ SmartTabs	AgroFresh Inc.
	A subsidiary of Rohm and Haas Company Philadelphia, PA 19106 Tel: (215) 592-3000

Active Ingredient:	
1-Methylcyclopropene..	0.63%
Other Ingredients:	99.37%
Total:	100.0%

EPA REGISTRATION NO. 71297-3
EPA EST. NO. 707-WA-001

NOTICE: Before using this product, read the entire Precautionary Statements, Conditions of Sale and Warranty, Directions for Use, Use Restrictions and Storage and Disposal Instructions. If the Conditions of Sale and Warranty are not acceptable, return the product and its generating system unopened and unused within thirty days of purchase to the place of purchase.

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

Net Contents: 10 tablets (12.5 g)

SmartFresh™ is effective under both cool (below 55 °F, 13 °C) and warm (above 55°F, 13°C) temperature conditions. To realize maximum benefit in controlling senescence, fruits should be treated as soon as possible after harvest.

Harvested fruits must be exposed to the volatile active ingredient of **SmartFresh™** in enclosed areas, such as storage rooms, greenhouses, coolers, shipping containers, enclosed truck trailers, or ambient temperature, refrigerated, or controlled atmosphere food storage facilities. This product is not intended for use outdoors or in other non-enclosed areas. These enclosed treatment areas should be gas tight as leakage will reduce **SmartFresh™**'s effectiveness.

Fruit Storage Conditions
SmartFresh™ is compatible with and complementary to both controlled atmosphere and regular air fruit storage conditions. **SmartFresh™** must be used in air tight storage areas.

Timing of Application
SmartFresh™ can be added to the storage area containing fruit immediately after harvest, upon entering storage, during distribution or in transit. After application, fruit not for immediate sale must be stored according to good standard commercial practices. It must be emphasized that maintaining the cold chain (keeping the fruit cool at all times) and strict adherence to phytosanitary practices remain essential in maintaining safe and high quality fruit.

Apples: Apply **SmartFresh™** soon after harvest. Best results are obtained when fruit is at the optimum maturity level for long term storage. For optimum quality, store apples that are to be held longer than six months in a controlled atmosphere.

Avocados: Apply **SmartFresh™** to the fruit soon after harvest at the physiological maturity stage or just prior to the "turning black" stage.

Bananas: Apply **SmartFresh™** after the bananas have been exposed to ethylene and prior to reaching color stage 4.

Melons: Apply **SmartFresh™** as soon after harvest as possible.

Tomatoes: Apply **SmartFresh™** between color stage mature green (Color Stage 1) and light red (Color Stage 5).

Application Method
Prior to application, ensure that the treatment area can be properly and promptly sealed following application. **SmartFresh™ SmartTabs** are used in conjunction with the **SmartFresh™ Activator Kit**. **SmartFresh™ SmartTabs** are **Green** tablets that, when mixed with **Blue** Activator Tablets in a proprietary Activator Solution, release the volatile active ingredient 1-methylcyclopropene (1-MCP). Make sure that you have a sufficient supply of both **SmartFresh™ SmartTabs** and **SmartFresh™ Activator Kits** available to treat your selected treatment area.

- Step 1: Selection of the appropriate number of SmartTabs and SmartTab Activator Kits for use
- Accurately determine the volume of your **EMPTY** treatment area in cubic feet. Multiply inside dimensions: volume = length X width X height.
 - Choose the correct number of **Green SmartFresh™ SmartTabs** from Table 1 below according to the size of the area and the crop to be treated.

Table 1. Number of **Green SmartTabs** Required

Volume of Treatment Area ft³	Avocado Banana	Melon Tomato	Apple
706 to 882	2	3	6
883 to 1058	3	4	8
1059 to 1235	3	5	9
1236 to 1412	4	6	11
1413 to 1588	4	6	12
1589 to 1765	5	7	14
1766 to 1941	5	8	15
1942 to 2118	5	9	17
2119 to 2294	6	9	19
2295 to 2471	6	10	20
2472 to 2648	7	11	22

Never use more than ten (10) **Green SmartFresh™ SmartTabs** per activator kit.

If more than ten (10) **Green SmartFresh™ SmartTabs** are needed, you must divide them among two (2) or more **SmartFresh™ Activator Kits**. Each Kit activates up to 10 **SmartFresh™ SmartTabs** only.

Always use two (2) Blue tablets for EACH Release Kit.

Table 1. Number of **Green SmartTabs** Required Continued

Volume of Treatment Area ft³	Avocado Banana	Melon Tomato	Apple
2649 to 2824	7	12	23
2825 to 3001	8	12	25
3002 to 3177	8	13	26
3178 to 3354	9	14	28
3355 to 3530	9	15	29
3531 to 3707	9	15	31
3708 to 3884	10	16	32
3885 to 4060	10	17	34
4061 to 4237	11	18	36
4238 to 4413	11	18	37
4414 to 4590	12	19	39
4591 to 4766	12	20	40
4767 to 4943	13	21	42
4944 to 5120	13	21	43
5121 to 5296	14	22	45
5297 to 5473	14	23	46
5474 to 5649	14	24	48
5650 to 5826	15	24	49
5827 to 6002	15	25	51
6003 to 6179	16	26	53
6180 to 6356	16	27	54
6357 to 6532	17	27	56
6533 to 6709	17	28	57
6710 to 6885	18	29	59
6886 to 7062	18	30	60
7063 to 7239	18	30	62
7240 to 7415	19	31	63
7416 to 7592	19	32	65
7593 to 7768	20	33	67
7769 to 7945	20	33	68

Never use more than ten (10) **Green SmartFresh™ SmartTabs** per activator kit.

If more than ten (10) **Green SmartFresh™ SmartTabs** are needed, you must divide them among two (2) or more **SmartFresh™ Activator Kits**. Each Kit activates up to 10 **SmartFresh™ SmartTabs** only.

Always use two (2) Blue tablets for EACH Release Kit.

Table 1. Number of Green SmartTabs Required Continued

Volume of Treatment Area ft ³	Avocado Banana	Melon Tomato	Apple
7946 to 8121	21	34	70
8122 to 8298	21	35	71
8299 to 8475	22	36	73
8476 to 8651	22	37	74
8652 to 8828	23	37	76
8829 to 9004	23	38	77
9005 to 9181	23	39	79
9182 to 9357	24	39	80
9358 to 9534	24	40	82
9535 to 9711	25	41	84
9712 to 9887	25	42	85
9888 to 10064	26	42	87
10065 to 10240	26	43	88
10241 to 10417	27	44	90
10418 to 10593	27	45	91
10594 to 10770	27	45	93
10771 to 10947	28	46	94

Never use more than ten (10) **Green SmartFresh™ SmartTabs** per activator kit.

If more than ten (10) **Green SmartFresh™ SmartTabs** are needed, you must divide them among two (2) or more **SmartFresh™** Activator Kits. Each Kit activates up to 10 **SmartFresh™ SmartTabs** only.

Always use two (2) Blue tablets for EACH Release Kit.

Step 2. Evaluation Of The Quality Of The Treatment Room / Trailer / Container

To be used with **SmartFresh™**, rooms/containers/trailers must be gas tight and have an internal fan for mixing the atmosphere.

Check that:

- All Room/Trailer/Container drain holes are plugged
- There are no holes in the walls, ceiling, or floor
- All vents to outside air are closed
- When viewed from a dark interior, no outside light is visible
- Door seals are in EXCELLENT condition
 - No missing rubber
 - No large cracks
 - No plastic slat doors
 - No roller top doors
 - No side doors
- Scrubbers and/or ozone generators are off

Step 3: Fill the treatment room with the fruit to be treated

Step 4: Release of 1-MCP.

- Remove the pack of two (2) **Blue SmartFresh™** Activator Tablets from the foam block. **Always use both Blue tablets.**
- Remove the appropriate number of **Green SmartTabs** from the **SmartFresh™ SmartTabs** Package.
- Peel off the foil seal from the **SmartFresh™** Activator Solution taking care not to spill the solution.
- Add both the **Blue** and **Green** Tablets to the Activator Solution.
- Replace the cap.
- Place the small container on a level surface e.g. in the bottom gap of the pallet. Keep the container upright.
- Exit the treatment room immediately and promptly close the doors and ensure they are tightly sealed in order to contain the **SmartFresh™** and ensure its maximum efficacy. The release of **SmartFresh™** to the area will start several minutes after addition of the **SmartTabs** to the Activator Solution.
- Circulate air in the room by means of the internal air circulation system for AT LEAST one (1) hour.
- Do not open the doors for AT LEAST twelve (12) hours.
- For controlled atmosphere storage containers or storage rooms, do not change the room atmosphere to controlled atmosphere conditions for AT LEAST twelve (12) hours.

Step 5: Reentry To The Storage Area

At the end of the **SmartFresh™** treatment period, vent the treated room by opening the doors for a minimum of thirty minutes with continued full internal ventilation before allowing workers to enter. At the end of the room venting, remove the **SmartFresh™** Activator Solution

and dispose of it as non-hazardous waste on-site or at an approved waste disposal facility. Treated fruit not intended for immediate sale should be stored according to standard commercial practices, in either refrigerated air or controlled atmosphere conditions.

Restrictions

Maximum season use rate: One application with appropriate number of tablets

Do not smoke during the **SmartFresh™** application.

Do not treat fruit stressed from poor fertility, heat, drought or sunscald

Do not treat fruit that have had a pre-harvest application of ethephon.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in original packaging in a cool, dry place.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse or equivalent. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

CONDITIONS OF SALE AND WARRANTY

AgroFresh Inc. warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label only when used in accordance with label directions under normal conditions of use. AgroFresh Inc. **MAKES NO OTHER EXPRESS OR IMPLIED WARRANTIES EITHER OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE.** Handling, storage and use of the product by Buyer or User are beyond the control of AgroFresh Inc. and Seller. Risks such as crop injury, ineffectiveness or other unintended consequences resulting from, but not limited to, weather or soil conditions, presence of other materials, disease, pests, drift to other crops or property, or failure to follow label directions will be assumed by the Buyer or User. **TO THE FULLEST EXTENT PERMITTED BY LAW, AgroFresh Inc. OR SELLER SHALL NOT BE HELD LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE HANDLING, STORAGE OR USE OF THIS PRODUCT**

SmartFresh™ is a registered trademark of AgroFresh, Inc./Rohm and Haas Company

AgroFresh Inc.

A Fully-Owned Subsidiary of Rohm and Haas Company

100 Independence Mall West

Philadelphia, PA. 19106

(215) 592-3000

**SmartFresh™
SmartTabs**

AgroFresh Inc.
A subsidiary of Rohm and Haas Company
Philadelphia, PA 19106
Tel: (215) 592-3000

Active Ingredient:

1-Methylcyclopropene.. 0.63%

Other Ingredients: 99.37%

Total: 100.0%

EPA REGISTRATION NO. 71297-3

EPA EST. NO. 707-WA-001

NOTICE: Before using this product, read the entire Precautionary Statements, Conditions of Sale and Warranty, Directions for Use, Use Restrictions and Storage and Disposal Instructions. If the Conditions of Sale and Warranty are not acceptable, return the product and its generating system unopened and unused within thirty days of purchase to the place of purchase.

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

FIRST AID

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

Net Contents: 10 tablets (12.5 g)



United States
Environmental Protection Agency
Washington, DC 20460

X

Registration

Amendment

Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number

71297-3

2. EPA Product Manager

Driss Benmhend

3. Proposed Classification

4. Company/Product (Name)

SmartFresh™ SmartTabs

PM#

None

Restricted

X

5. Name and Address of Applicant (Include Zip Code)

AgroFresh Inc./Rohm and Haas Company
100 Independence Mall West
Philadelphia, PA 19106-2399

6. **Expedited Review.** In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to:

EPA Reg. No.

Product Name

☐ Check if this is a new address**Section - II**

Amendment - Explain below.



Final printed labels in response to
Agency letter dated _____



"Me Too" Application.

Notification - Explain below.

Other - Explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

This submission is being sent in response to the letter from Dr. Sheryl Reilly dated July 21, 2005. That letter requested a number of wording changes to the draft SmartFresh SmartTabs label that had been submitted for the addition of broccoli to that label. The recommended changes have been made to the draft label, and the revised label is being submitted with this application.

Section - III**1. Material This Product Will Be Packaged In:**

Child-Resistant Packaging

☐ Yes*
☒ No

Unit Packaging

☐ Yes
☒ No

Water Soluble Packaging

☐ Yes
☒ No

2. Type of Container

☐ Metal
☒ Plastic
☐ Glass
☒ Paper
☒ Other (Specify) Blister Pack

* **Certification must
be submitted**

If "Yes"

No. per

Unit Packaging wgt.

container

If "Yes"

No. per

Package wgt

container

3. Location of Net Contents Information

☒ Label☐ Container

4. Size(s) Retail Container

Blister pack containing ten tablets

5. Location of Label Directions

☒ On Label☒ On Labeling accompanying product

6. Manner in Which Label is Affixed to Product

☐ Lithograph
☒ Paper glued
☐ Stenciled

Other _____

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name: Robert H. Larkin Title: President, Regulatory Solutions, LLC Telephone No. (Include Area Code): 215-284-6702

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature

3. Title

President, Regulatory Solutions, LLC

4. Typed Name

Robert H. Larkin

5. Date

August 9 2005

6. Date Application

Received

(Stamped)

Science Reviews & BRADs Prior to
September 2005 Scanned and Placed into
Archive Record Series Database

Hard Copy Retired to Federal Record Center

Copies of 1st Page of Reviews & BRADs
Follow



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

FEB 24 2004

MEMORANDUM

SUBJECT: Science Review in Support of the Registration of Smart Fresh Smart Tabs (EPA File Symbol No. 71297-G) Containing 0.63% 1-Methylcyclopropene (Chemical No. 224459) As Its Active Ingredient. Review of Product Chemistry Studies. DP Barcode D298755; Decision No. 331429; Submission No. S753611; No.

FROM: Russell S. Jones, Ph.D., Senior Biologist
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511C)

TO: Driss Benmhend, Regulatory Action Leader
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511C)

ACTION REQUESTED

In response to a request for additional data/information (see Memorandum from R. S. Jones to D. Benmhend, dated 10/08/2004), Agrofresh, Inc., a subsidiary of Rohm and Haas Co., submitted a revised Confidential Statement of Formula (CSF, dated 12/01/2003) in support of the registration of Smart Fresh Smart Tabs (EPA File Symbol No. 71297-G).

CONCLUSIONS AND RECOMMENDATIONS

- 1a. The product chemistry submission is acceptable to support registration. Two coloring agents that were not cleared for food use under 40 CFR 180.1001 were replaced with a colorant that was cleared under 40 CFR 180.1001(d). Minor typographical errors and an incorrect CAS No. for another inert were corrected (see Conclusions 1a and 1b in the Memorandum from R. S. Jones to D. Benmhend, dated 10/08/2004).
- 1b. The registrant intends to submit complete data from an ongoing storage stability study upon completion. Sufficient interim information regarding storage stability (and corrosion characteristics) were previously submitted to support registration. Data from both studies must be sent to the Agency upon completion (see Conclusion 1d in the Memorandum from R. S. Jones to D. Benmhend, dated 10/08/2004).

3/4/04 Jones
The previously submitted storage stability study was acceptable. Registrant is conducting a longer term study that we do not require. Request that the new data be submitted as supplementary upon completion.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OCT 08 2003

MEMORANDUM

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

SUBJECT: Science Review in Support of the Registration of SmartFresh™ SmartTabs (EPA Reg. No. 071297-G) Containing 0.63% 1-Methylcyclopropene (Chemical No. 224459) As Its Active Ingredient. DP Barcode D289720; Case No. 065325; Submission No. S632726 (MRID Nos.).

FROM: Russell S. Jones, Ph.D., Biologist
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511C)

A handwritten signature in black ink, appearing to read "Russell S. Jones".

TO: Driss Benmhend, Regulatory Action Leader
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511C)

ACTION REQUESTED

AgroFresh, Inc. (a subsidiary of Rohm and Haas Company) requests registration of SmartFresh™ SmartTabs Technology (EPA Reg. No. 071297-1) containing 0.63% 1-methylcyclopropene (1-MCP) as its active ingredient. The product is intended for indoor use on bananas, tomatoes, melons, and avocados. The formulation is substantially similar to SmartFresh™ Technology (EPA Reg. No. 071297-1) containing 3.3% 1-methylcyclopropene (1-MCP) as its active ingredient, and is designed for the treatment of smaller fruit rooms. In support of the registration, the registrant has submitted a Confidential Statement of Formula (CSF, dated 1/21/2003), and acute toxicity study (MRID 458841-02), and waiver requests for Tier I toxicity and Tier I non-target organism studies (via the data matrix).

RECOMMENDATIONS AND CONCLUSIONS

- 1a. The product chemistry submission is unacceptable, but upgradeable. The submission is unacceptable due to the use of two inert ingredients that are not cleared for food use (see Confidential section below). To upgrade the submission to acceptable, the registrant must replace these two inerts (used as coloring agents) with colorants listed in 40 CFR 180.1001.
- 1b. The CAS No. listed for [REDACTED] must be changed to [REDACTED] to agree with the Agency database. A minor typographical error should be

DATA EVALUATION RECORD

1-METHYLCYCLOPROPENE (SMARTFRESH SMARTTABS)

STUDY TYPE: Product Identity and Composition (OPPTS 830.1550)
Description of Beginning Materials (OPPTS 830.1600)
Description of Formulation Process (OPPTS 830.1650)
Discussion of Formation of Impurities (OPPTS 830.1670)
Preliminary Analysis (OPPTS 830.1700)
Certified Limits (OPPTS 830.1750)
Enforcement Analytical Method (OPPTS 830.1800)
Physical and Chemical Characteristics (OPPTS 830.6302-830.7950)
MRIDs 45843901, 45884101, and 45884102

Prepared for
Biopesticides and Pollution Prevention Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
1921 Jefferson Davis Highway
Arlington, VA 22202

Prepared by
Toxicology and Hazard Assessment Group
Life Sciences Division
Oak Ridge National Laboratory
Oak Ridge, TN 37830
Task Order No. 03-13

Primary Reviewer:
Susan Chang, M.S.

Secondary Reviewers:
Sylvia Milanez, Ph.D., D.A.B.T.

Robert H. Ross, M.S., Group Leader

Quality Assurance:
Lee Ann Wilson, M.A.

Signature: _____

Date: _____

Signature: _____

Date: _____

Signature: _____

Date: _____

Signature: _____

Date: _____

Disclaimer

This review may have been altered subsequent to the contractor's signatures above.

Oak Ridge National Laboratory managed and operated by UT-Battelle, LLC., for the U.S. Department of Energy under Contract No. DE-AC05-00OR22725.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUL 21 2005

778851 300
76 12

Dr. Robert H. Larkin
Agro Fresh Inc.
c/o Rohm and Haas Company
100 Independence Mall West
Philadelphia, PA 19105

Re: Label Amendment to add "Broccoli": Application Dated 5/9/05
EPA Registration Number: 71297-3
Product Name: Smart Fresh™ Smart Tabs

Dear Dr. Larkin:

The amendment referred to above, submitted in connection with registration under FIFRA section 3(c)(7)(A), cannot be approved until revisions are made. The changes that need to be made to the label are described below.

(1) Child Hazard Warning Statement/Signal Word:

Move the Child Hazard Warning Statement (KOROC) and the signal word (CAUTION) up so they appear between the section titled "Notice" and the First Aid Box.

(2) First Aid:

In the First Aid Section, include the following sentence which offers a hotline number for emergency treatment information after the statement which reads, "Have the product container or label with you when calling a poison control center or doctor, or going for treatment":

"You may also contact 1-800-xxx-xxxx for emergency medical treatment information."

(Pesticide Registration (PR) Notice 2001-1.)

(3) Precautionary Statements:

Precautionary Statements should reflect the routes of exposure addressed in the First Aid statements. Therefore, add the following Precautionary Statements:

CONCURRENCES

SYMBOL	7511C	754C	7511C					
SURNAME	Abbott	Peterson	Ruff					
DATE	6/28/05	7/18/05	7/19/05					

AgroFresh Inc.

Letter re: EPA Amendment dated 5/9/05

- Harmful if swallowed.
- Harmful if inhaled.
- Avoid contact with skin, eyes, or clothing.

Also, organize the First Aid Statements and Precautionary Statements so that the most severe routes of exposure, as supported by the toxicity classifications, are listed first.

(Label Review Manual, 3rd edition August 2003 (LRM), 7-7 through 7-12.)

(4) User Safety Recommendations:

Add a box after the PPE section which contains the following User Safety Recommendations:

“User Safety Recommendations

Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.”

(LRM, 10-18.)

(5) Directions for Use:

A) Revise the fourth sentence of the Directions for Use section to read, “For any requirements specific to your State or Tribe, consult the State or Tribal agency responsible for pesticide regulation.”

(LRM, 10-19.)

B) The language used in the Directions for Use section of the label must be written in imperative or directive terms. Words such as “should,” “may,” and “recommend,” can create ambiguities that confuse the user. The following are suggested revisions for making advisory statements on your label directive.

- i.) On page four, change the last sentence of the first paragraph to read, “To realize maximum benefit in controlling senescence, treat fruits and vegetables as soon as possible after harvest.”

AgroFresh Inc.

Letter re: EPA Amendment dated 5/9/05

ii.) On page four, change the last sentence of the second paragraph to read, "These enclosed treatment areas must be gas tight as leakage will reduce Smart Fresh™'s effectiveness."

iii.) Change the second sentence on page nine to read, "Store treated fruit and vegetables not intended for immediate sale according to standard commercial practices, in either refrigerated air or controlled atmosphere conditions."

(PR Notice 2000-5.)

C) On page nine, a period is missing following the sentence which reads, "Do not treat fruit or vegetables stressed from poor fertility, heat, drought or sunscald."

(6) Storage and Disposal:

In the Storage and Disposal section, replace the word "may" with "must" in the Pesticide Disposal statement, "Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility."

(LRM, 13-5.)

Please revise and resubmit your label. Be sure to include an unmarked version of the label in addition to the highlighted version. We did not receive an unmarked label with this submission, and we cannot stamp a highlighted label "acceptable." Additionally, we have not received a copy of your final printed labeling for Smart Fresh™ Smart Tabs as requested in our letter to you dated March 5, 2004. Please include a copy in your response to this letter.

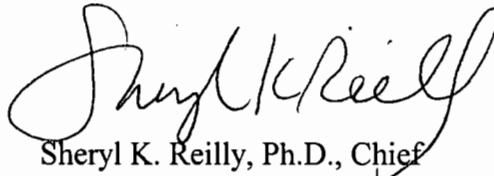
Biopesticides and Pollution Prevention Division will hold associated documents for 75 days to give opportunity to resubmit the supporting data and/or information in acceptable form. If you have not done so by that time, the application and other associated documents may be administratively withdrawn from further consideration without notice to you, in accordance with policies established by PR Notice 75-4 dated August 27, 1975.

AgroFresh Inc.

Letter re: EPA Amendment dated 5/9/05

If you have questions concerning this letter, contact Ms. Tasha Gibbons at (703)308-0022 (gibbons.tasha@epa.gov), or me at (703)308-8269 (reilly.sheryl@epa.gov). We are looking forward to completion of this action as quickly as possible.

Sincerely,

A handwritten signature in cursive script, reading "Sheryl K. Reilly". The signature is written in dark ink and is positioned above the printed name and title.

Sheryl K. Reilly, Ph.D., Chief
Biochemical Pesticides Branch
Biopesticides and Pollution
Prevention Division (7511C)

SmartFresh™ SmartTabs	AgroFresh Inc. A subsidiary of Rohm and Haas Company Philadelphia, PA. 19106 Tel: (215) 592-3000
--	--

Active Ingredient:

1-Methylcyclopropene..... 0.63%

Other Ingredients: 99.37%

Total: 100.0%

EPA REGISTRATION NO. 71297-3

EPA EST. NO. 707-WA-001

NOTICE: Before using this product, read the entire Precautionary Statements, Conditions of Sale and Warranty, Directions for Use, Use Restrictions and Storage and Disposal Instructions. If the Conditions of Sale and Warranty are not acceptable, return the product and its generating system unopened and unused within thirty days of purchase to the place of purchase.

move above first AID Box

KEEP OUT OF REACH OF CHILDREN
CAUTION

FIRST AID

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

Add hotline #

You may also contact 1-800-... for emergency medical treatment

Net Contents: 10 tablets (12.5 g)

1 Warning

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Causes slight eye irritation. Harmful if absorbed through skin. Avoid contact with eyes. Avoid breathing vapor. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators of this product must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Safety glasses or goggles

Applicators and handlers must follow manufacturer's instructions for cleaning / maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

*Free. Starts.
Should match
First Aid Books of Exposure,
in order of most severe
tox. levels.*

*Harmful if swallowed.
Avoid contact with skin, eyes, or clothing.
Harmful if inhaled.
~~toxic~~*

User Safety Recommendation

Users should:

-
-
-

*2RM
(10-18)*

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your state or tribe, consult the ^{State or Tribal} agency responsible for pesticide regulation. All applicable directions, restrictions, precautions and conditions of sale and warranty are to be followed. This labeling must be in the user's possession during application.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Workers Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas prior to venting the volatile active ingredient from the treatment room and during the REI of 30 minutes after the room has been vented.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, prior to venting the volatile active ingredient from the treatment room is:

- Coveralls
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P, or HE prefilter.

GENERAL INFORMATION

SmartFresh™ is a unique postharvest tool for counteracting many of the undesirable effects of both internal (produced within the fruit **or vegetable**) and external sources of ethylene on harvested fruit **and vegetables**. By counteracting ethylene, SmartFresh™ provides many benefits to the fruit **and vegetables** during transport and storage including:

- Maintaining firmness
- Maintaining titratable acidity
- Preventing superficial scald and soft scald on apples
- Reducing internal ethylene production

- Protection from external sources of ethylene
- Reducing respiration
- Delaying ripening and senescence
- Reducing incidence of peel greasiness in apples
- Reducing incidence of core flush and mealiness in apples
- Reducing chilling injury

SmartFresh™ can be used immediately after harvest, prior to storage, prior to shipment or just prior to sale. SmartFresh™ is effective under both cool (below 55 °F, 13 °C) and warm (above 55°F, 13°C) temperature conditions. To realize maximum benefit in controlling senescence, fruits **and vegetables** should be treated as soon as possible after harvest.

Harvested fruit **and vegetables** must be exposed to the volatile active ingredient of SmartFresh™ in enclosed areas, such as storage rooms, greenhouses, coolers, shipping containers, enclosed truck trailers, or ambient temperature, refrigerated, or controlled atmosphere food storage facilities. This product is not intended for use outdoors or in other non-enclosed areas. These enclosed treatment areas should be gas tight as leakage will reduce SmartFresh™'s effectiveness.

Fruit And Vegetable Storage Conditions

SmartFresh™ is compatible with and complementary to both controlled atmosphere and regular air fruit **and vegetable** storage conditions. SmartFresh™ must be used in air tight storage areas.

Timing of Application

SmartFresh™ can be added to the storage area containing fruit **or vegetables** immediately after harvest, upon entering storage, during distribution or in transit. After application, fruit **or vegetables** not for immediate sale must be stored according to good standard commercial practices. It must be emphasized that maintaining the cold chain (keeping the fruit **and vegetables** cool at all times) and strict adherence to phytosanitary practices remain essential in maintaining safe and high quality fruit **and vegetables**.

Apples: Apply SmartFresh™ soon after harvest. Best results are obtained when fruit is at the optimum maturity level for long term storage. For optimum quality, store apples that are to be held longer than six months in a controlled atmosphere.

Avocados: Apply SmartFresh™ to the fruit soon after harvest at the physiological maturity stage or just prior to the "turning black" stage.

Bananas: Apply SmartFresh™ after the bananas have been exposed to ethylene and prior to reaching color stage 4.

Broccoli: Apply SmartFresh™ as soon after harvest as possible.

Melons: Apply SmartFresh™ as soon after harvest as possible.

Tomatoes: Apply SmartFresh™ between color stage mature green (Color Stage 1) and light red (Color Stage 5).

Application Method

Prior to application, ensure that the treatment area can be properly and promptly sealed following application. SmartFresh™ SmartTabs are used in conjunction with the SmartFresh™ Activator Kit. SmartFresh™ SmartTabs are **Green** tablets that, when mixed with **Blue** Activator Tablets in a proprietary Activator Solution, release the volatile active ingredient 1-methylcyclopropene (1-MCP). Make sure that you have a sufficient supply of both SmartFresh™ SmartTabs and SmartFresh™ Activator Kits available to treat your selected treatment area.

Step 1: Selection of the appropriate number of SmartTabs and SmartTab Activator Kits for use

a.) Accurately determine the volume of your EMPTY treatment area in cubic feet. Multiply inside dimensions: volume = length X width X height.

b.) Choose the correct number of **Green** SmartFresh™ SmartTabs from Table 1 below according to the size of the area and the crop to be treated.

Table 1. Number of **Green** SmartTabs Required

Volume of Treatment Area ft ³	Avocado Banana	Melon Tomato	Apple Broccoli
706 to 882	2	3	6
883 to 1058	3	4	8
1059 to 1235	3	5	9
1236 to 1412	4	6	11
1413 to 1588	4	6	12
1589 to 1765	5	7	14
1766 to 1941	5	8	15
1942 to 2118	5	9	17
2119 to 2294	6	9	19
2295 to 2471	6	10	20
2472 to 2648	7	11	22
2649 to 2824	7	12	23
2825 to 3001	8	12	25
3002 to 3177	8	13	26
3178 to 3354	9	14	28
3355 to 3530	9	15	29
3531 to 3707	9	15	31
3708 to 3884	10	16	32
3885 to 4060	10	17	34
4061 to 4237	11	18	36
4238 to 4413	11	18	37
4414 to 4590	12	19	39
4591 to 4766	12	20	40
4767 to 4943	13	21	42
4944 to 5120	13	21	43
5121 to 5296	14	22	45

Never use more than ten (10) **Green** SmartFresh™ SmartTabs per activator kit. If more than ten (10) **Green** SmartFresh™ SmartTabs are needed, you must divide them among two (2) or more SmartFresh™ Activator Kits. Each Kit activates up to 10 SmartFresh™ SmartTabs only.

Always use two (2) Blue tablets for EACH Release Kit.

Table 1. Number of **Green** SmartTabs Required
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6003 to 6179	16	26	53
6180 to 6356	16	27	54
6357 to 6532	17	27	56
6533 to 6709	17	28	57
6710 to 6885	18	29	59
6886 to 7062	18	30	60
7063 to 7239	18	30	62
7240 to 7415	19	31	63
7416 to 7592	19	32	65
7593 to 7768	20	33	67
7769 to 7945	20	33	68
7946 to 8121	21	34	70
8122 to 8298	21	35	71
8299 to 8475	22	36	73
8476 to 8651	22	37	74
8652 to 8828	23	37	76
8829 to 9004	23	38	77
9005 to 9181	23	39	79
9182 to 9357	24	39	80
9358 to 9534	24	40	82
9535 to 9711	25	41	84
9712 to 9887	25	42	85
9888 to 10064	26	42	87
10065 to 10240	26	43	88
10241 to 10417	27	44	90
10418 to 10593	27	45	91
10594 to 10770	27	45	93
10771 to 10947	28	46	94

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Step 2. Evaluation Of The Quality Of The Treatment Room / Trailer / Container

To be used with SmartFresh™, rooms/containers/trailers must be gas tight and have an internal fan for mixing the atmosphere.

Check that:

- All Room/Trailer/Container drain holes are plugged
- There are no holes in the walls, ceiling, or floor
- All vents to outside air are closed
- When viewed from a dark interior, no outside light is visible
- Door seals are in EXCELLENT condition
 - No missing rubber No large cracks
 - No plastic slat doors No roller top doors
 - No side doors
- Scrubbers and/or ozone generators are off

Step 3: Fill the treatment room with the fruit **or vegetables** to be treated

Step 4: Release of 1-MCP

- a) Remove the pack of two (2) Blue SmartFresh™ Activator Tablets from the foam block.
Always use both Blue tablets.
- b) Remove the appropriate number of **Green** SmartTabs from the SmartFresh™ SmartTabs Package.
- c) Peel off the foil seal from the SmartFresh™ Activator Solution taking care not to spill the solution.
- d) Add both the **Blue** and **Green** Tablets to the Activator Solution.
- e) Replace the cap.
- f) Place the small container on a level surface e.g. in the bottom gap of the pallet. Keep the container upright.
- g) Exit the treatment room immediately and promptly close the doors and ensure they are tightly sealed in order to contain the SmartFresh™ and ensure its maximum efficacy. The release of SmartFresh™ to the area will start several minutes after addition of the SmartTabs to the Activator Solution.
- h) Circulate air in the room by means of the internal air circulation system for AT LEAST one (1) hour.
- i) Do not open the doors for AT LEAST twelve (12) hours.
- j) For controlled atmosphere storage containers or storage rooms, do not change the room atmosphere to controlled atmosphere conditions for AT LEAST twelve (12) hours.

Step 5: Reentry To The Storage Area

At the end of the SmartFresh™ treatment period, vent the treated room by opening the doors for a minimum of thirty minutes with continued full internal ventilation before allowing workers to

enter. At the end of the room venting, remove the SmartFresh™ Activator Solution and dispose of it as non-hazardous waste on-site or at an approved waste disposal facility. Treated fruit or vegetables not intended for immediate sale should be stored according to standard commercial practices, in either refrigerated air or controlled atmosphere conditions.

Restrictions

Maximum season use rate: One application with appropriate number of tablets

Do not smoke during the SmartFresh™ application.

Do not treat fruit or vegetables stressed from poor fertility, heat, drought or sunscald.

Do not treat fruit that have had a pre-harvest application of ethephon.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in original packaging in a cool, dry place.

Pesticide Disposal: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse or equivalent. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

CONDITIONS OF SALE AND WARRANTY

AgroFresh Inc. warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label only when used in accordance with label directions under normal conditions of use. AgroFresh Inc. **MAKES NO OTHER EXPRESS OR IMPLIED WARRANTIES EITHER OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE.** Handling, storage and use of the product by Buyer or User are beyond the control of AgroFresh Inc. and Seller. Risks such as crop injury, ineffectiveness or other unintended consequences resulting from, but not limited to, weather or soil conditions, presence of other materials, disease, pests, drift to other crops or property, or failure to follow label directions will be assumed by the Buyer or User. **TO THE FULLEST EXTENT PERMITTED BY LAW, AgroFresh Inc. OR SELLER SHALL NOT BE HELD LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE HANDLING, STORAGE OR USE OF THIS PRODUCT**

SmartFresh™ is a registered trademark of AgroFresh, Inc./Rohm and Haas Company

EPA Reg. No.: 71297-3
 RAL: T. Gibbons

BPPD Label Amendment Check List

Application Date: 5/9/05
 Internal BPPD Guidance Document - Other Items May be Required Updated 7/02

No.	Check List Item	Yes	No
1.	Application Form (EPA Form 8570-1) -signed & complete including package type? If NO, STOP! Call applicant and have them correct application and resubmit.	✓	
1a.	Fast-Track?	✓	
2.	Amendment covered by PR Notice 98-10 (Notifications)? IF YES, STOP. Call applicant and inform them that this submission will be converted to a notification. After closing out in PRATS, forward to Notification Review Coordinator.		✓
3.	Final printed labeling received for previous action? If NO, Stop! E-mail applicant and request final printed labeling (FPL). Inform them that FPL from the last accepted label is needed to support the current application. File e-mail as record of notification. Log out of PRATS (label deficiency).		✓
4.	Data and Data Matrix (EPA Form 8570-35)		NA
	a) using Selective Method? [If NO, (Data Matrix not required), skip to Item 5.]		
	1) Complete Data Matrix. Minimum Data Matrix for registration includes: Product specific acute tox and product chemistry data, plus Efficacy data for Public Health pests claimed on label.		
	b) Adequate Product Specific data		
	c) Registered source used for active ingredient? If Yes, active ingredient is from a registered source and generic data should be satisfied by registered source. Skip to Item 5. If No, generic data is necessary.		
	d) Data passed 86-5? (Data formatting PR Notice)		
	e) Public copy of Matrix provided? (As required by PRN 98-5)		
5.	Certification with Respect to Citation of Data (EPA Form 8570-34) See 40 CFR 152.80-98 and PR Notice 98-5 [Note: If no data are required or submitted, a Certification with Respect to Citation of Data form is not needed. This is often true for minor amendments.]		NA
	a) Did applicant check a Method of Support?		
	b) General Offer to Pay checked for Cite-all Method or Cite-all under Selective Method?		
	c) Is the form signed and dated?		
	d) Check form and Data Matrix; are Exclusive Use data cited from other sources?		
	1.) If Yes, is the required authorization letter included in application?		
6.	Label(s) Review Date of Label Review: <u>6/24/05</u> Bob Torla Concurrence for OMRI Logo:		
a.	Label(s) agrees with current Label Review Manual and appropriate REDS		✓
b.	Labeling from acute tox, product chemistry, and efficacy data (Public Health pests)	✓	
c.	Nominal concentration of active ingredient shown in ingredients statement	✓	
d.	Viability included as substatement of Ingredient Statement (if live microbial, e.i., cfu/gram)	NA	
e.	Storage and disposal instructions agree with container types listed on application form	✓	
f.	Unique Product Name for Same Company (Check REFS)	✓	
g.	Labeling is acceptable. Corrections or changes are NOT necessary.		✓

File Symbol: 71297-3 Label Review Date: 6/24/05 Reviewer: T. Gibbons

Label Requirement	Acceptable	Not Acceptable	N/A	Comments Recommendations	LRM3
[Site/Use]	[Res /Ag ✓ /Both]			[Food ✓ /Non-Food /Both]	
[Tox Categories:]	[AcOral: 4 /AcDerm: 3 /AcInhl: 4 /EyeIrr: 3 /SkinIrr: 4 /DermSens:]				
Restricted Use Pesticide			✓		Ch 6
Product Name	✓				Pg 12-3
Compny Name and Info	✓				Pg 15-1
Identification Numbers	✓				Ch 14
Net Contents					Ch 17
Ingredients Statement	✓				Ch 5
Label Claims	✓				Pgs 4-5, 5-7 11-10 & Ch 12
Alternate Formula			✓		5-12

Precautionary Statements					
Label Requirement	Acceptable	Not Acceptable	N/A	Comments Recommendations	LRM3
KOROC	✓				3-1 & 9 7-3 & 4
Signal Word	✓				Ch 3 Ch 7 Ch 10
General Heading 'PRECAUTIONARY STATEMENTS'	✓				Ch 7
First Aid (PRN 20001-1)		✓			Ch 3 & 7

Precautionary Statements					
Label Requirement	Acceptable	Not Acceptable	N/A	Comments Recommendations	LRM3
Hazards to Humans and Domestic Animals		✓			Ch 3, 7-3
PPE (WPS) Engineering Controls	✓				Ch 7, Pg 7-12 Pgs 10-4, 15
User Safety Requirements			✓		Ch 10
User Safety Recommendations		✓			Ch 10
Environmental Hazards	✓				Ch 3

Directions for USE (FIFRA Text, WPS plus Storage and Disposal)					
Label Requirement	Acceptable	Not Acceptable	N/A	Comments Recommendations	LRM3
Header 'Directions for Use'	✓				10-16
Violation of Federal Law text	✓				10-26, 11-7
WPS Text (PPE)	✓				Ch 10, 7-1 7-11
Non-WPS Text			✓		7-12, Ch 10
Storage and Disposal		✓		minor edit	11-16, Ch 13

Directions for Use (General Instructions and Information)					
Label Requirement	Acceptable	Not Acceptable	N/A	Comments - Recommendations	LRM3
General Instructions and Sub-Header		✓			
Chemigation / Prohibition			✓		PRN
REI	✓				Pg 10-20

Directions for Use (General Instructions and Information)					
Label Requirement	Acceptable	Not Acceptable	N/A	Comments Recommendations	LRM3
General Info. (non-site specific info. on uses, pests, mixing, and loading, tank mixing, etc.)	✓	scribble		scribble	
General Precautions and Restrictions	✓				
Directions for Use					
Directions for Application	scribble	✓		minor edits	
Warranty Information					
Consistency with label instructions	✓				12-6
Not false or misleading	✓				
<p>"The warranty section contains an overly broad statement concerning limitations of liability. As such, this statement may be misleading and may constitute misbranding under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). It is suggested that the existing statement be preceded by the phrase, "to the extent allowable by state law", or otherwise qualified to make it clear that this warranty is not intended to be a statement of law which implies that the buyer has no legal rights to recover damages from the manufacturer if he/she suffered a loss or injury from the product and concludes that it would be futile to pursue what might in reality be a valid claim."</p>					

file: LABEL_Review.AID3.wpd

SmartFresh™ SmartTabs	AgroFresh Inc. A subsidiary of Rohm and Haas Company Philadelphia, PA. 19106 Tel: (215) 592-3000
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Active Ingredient:

1-Methylcyclopropene.. 0.63%

Other Ingredients: 99.37%

Total: 100.0%

EPA REGISTRATION NO. 71297-3

EPA EST. NO. 707-WA-001

NOTICE: Before using this product, read the entire Precautionary Statements, Conditions of Sale and Warranty, Directions for Use, Use Restrictions and Storage and Disposal Instructions. If the Conditions of Sale and Warranty are not acceptable, return the product and its generating system unopened and unused within thirty days of purchase to the place of purchase.

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

Net Contents: 10 tablets (12.5 g)

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Causes slight eye irritation. Harmful if absorbed through skin. Avoid contact with eyes. Avoid breathing vapor. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators of this product must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Safety glasses or goggles

Applicators and handlers must follow manufacturer's instructions for cleaning / maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling . Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your state or tribe, consult the agency responsible for pesticide regulation. All applicable directions, restrictions, precautions and conditions of sale and warranty are to be followed. This labeling must be in the user's possession during application.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Workers Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas prior to venting the volatile active ingredient from the treatment room and during the REI of 30 minutes after the room has been vented.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, prior to venting the volatile active ingredient from the treatment room is:

- Coveralls
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P, or HE prefilter.

GENERAL INFORMATION

SmartFresh™ is a unique postharvest tool for counteracting many of the undesirable effects of both internal (produced within the fruit **or vegetable**) and external sources of ethylene on harvested fruit **and vegetables**. By counteracting ethylene, SmartFresh™ provides many benefits to the fruit **and vegetables** during transport and storage including:

- Maintaining firmness
- Maintaining titratable acidity
- Preventing superficial scald and soft scald on apples
- Reducing internal ethylene production

- Protection from external sources of ethylene
- Reducing respiration
- Delaying ripening and senescence
- Reducing incidence of peel greasiness in apples
- Reducing incidence of core flush and mealiness in apples
- Reducing chilling injury

SmartFresh™ can be used immediately after harvest, prior to storage, prior to shipment or just prior to sale. SmartFresh™ is effective under both cool (below 55 °F, 13 °C) and warm (above 55°F, 13°C) temperature conditions. To realize maximum benefit in controlling senescence, fruits **and vegetables** should be treated as soon as possible after harvest.

Harvested fruit **and vegetables** must be exposed to the volatile active ingredient of SmartFresh™ in enclosed areas, such as storage rooms, greenhouses, coolers, shipping containers, enclosed truck trailers, or ambient temperature, refrigerated, or controlled atmosphere food storage facilities. This product is not intended for use outdoors or in other non-enclosed areas. These enclosed treatment areas should be gas tight as leakage will reduce SmartFresh™'s effectiveness.

Fruit **And Vegetable Storage Conditions**

SmartFresh™ is compatible with and complementary to both controlled atmosphere and regular air fruit **and vegetable** storage conditions. SmartFresh™ must be used in air tight storage areas.

Timing of Application

SmartFresh™ can be added to the storage area containing fruit **or vegetables** immediately after harvest, upon entering storage, during distribution or in transit. After application, fruit **or vegetables** not for immediate sale must be stored according to good standard commercial practices. It must be emphasized that maintaining the cold chain (keeping the fruit **and vegetables** cool at all times) and strict adherence to phytosanitary practices remain essential in maintaining safe and high quality fruit **and vegetables**.

Apples: Apply SmartFresh™ soon after harvest. Best results are obtained when fruit is at the optimum maturity level for long term storage. For optimum quality, store apples that are to be held longer than six months in a controlled atmosphere.

Avocados: Apply SmartFresh™ to the fruit soon after harvest at the physiological maturity stage or just prior to the "turning black" stage.

Bananas: Apply SmartFresh™ after the bananas have been exposed to ethylene and prior to reaching color stage 4.

Broccoli: Apply SmartFresh™ as soon after harvest as possible.

Melons: Apply SmartFresh™ as soon after harvest as possible.

Tomatoes: Apply SmartFresh™ between color stage mature green (Color Stage 1) and light red (Color Stage 5).

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7240 to 7415	19	31	63
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7593 to 7768	20	33	67
7769 to 7945	20	33	68
7946 to 8121	21	34	70
8122 to 8298	21	35	71
8299 to 8475	22	36	73
8476 to 8651	22	37	74
8652 to 8828	23	37	76
8829 to 9004	23	38	77
9005 to 9181	23	39	79
9182 to 9357	24	39	80
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To be used with SmartFresh™, rooms/containers/trailers must be gas tight and have an internal fan for mixing the atmosphere.

Check that:

- All Room/Trailer/Container drain holes are plugged
- There are no holes in the walls, ceiling, or floor
- All vents to outside air are closed
- When viewed from a dark interior, no outside light is visible
- Door seals are in EXCELLENT condition
 - No missing rubber No large cracks
 - No plastic slat doors No roller top doors
 - No side doors
- Scrubbers and/or ozone generators are off

Step 3: Fill the treatment room with the fruit **or vegetables** to be treated

Step 4: Release of 1-MCP

- a) Remove the pack of two (2) Blue SmartFresh™ Activator Tablets from the foam block.
Always use both Blue tablets.
- b) Remove the appropriate number of **Green** SmartTabs from the SmartFresh™ SmartTabs Package.
- c) Peel off the foil seal from the SmartFresh™ Activator Solution taking care not to spill the solution.
- d) Add both the **Blue** and **Green** Tablets to the Activator Solution.
- e) Replace the cap.
- f) Place the small container on a level surface e.g. in the bottom gap of the pallet. Keep the container upright.
- g) Exit the treatment room immediately and promptly close the doors and ensure they are tightly sealed in order to contain the SmartFresh™ and ensure its maximum efficacy. The release of SmartFresh™ to the area will start several minutes after addition of the SmartTabs to the Activator Solution.
- h) Circulate air in the room by means of the internal air circulation system for AT LEAST one (1) hour.
- i) Do not open the doors for AT LEAST twelve (12) hours.
- j) For controlled atmosphere storage containers or storage rooms, do not change the room atmosphere to controlled atmosphere conditions for AT LEAST twelve (12) hours.

Step 5: Reentry To The Storage Area

At the end of the SmartFresh™ treatment period, vent the treated room by opening the doors for a minimum of thirty minutes with continued full internal ventilation before allowing workers to

enter. At the end of the room venting, remove the SmartFresh™ Activator Solution and dispose of it as non-hazardous waste on-site or at an approved waste disposal facility. Treated fruit **or vegetables** not intended for immediate sale should be stored according to standard commercial practices, in either refrigerated air or controlled atmosphere conditions.

Restrictions

Maximum season use rate: One application with appropriate number of tablets

Do not smoke during the SmartFresh™ application.

Do not treat fruit **or vegetables** stressed from poor fertility, heat, drought or sunscald

Do not treat fruit that have had a pre-harvest application of ethephon.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in original packaging in a cool, dry place.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse or equivalent. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

CONDITIONS OF SALE AND WARRANTY

AgroFresh Inc. warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label only when used in accordance with label directions under normal conditions of use. AgroFresh Inc. **MAKES NO OTHER EXPRESS OR IMPLIED WARRANTIES EITHER OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE.** Handling, storage and use of the product by Buyer or User are beyond the control of AgroFresh Inc. and Seller. Risks such as crop injury, ineffectiveness or other unintended consequences resulting from, but not limited to, weather or soil conditions, presence of other materials, disease, pests, drift to other crops or property, or failure to follow label directions will be assumed by the Buyer or User. **TO THE FULLEST EXTENT PERMITTED BY LAW, AgroFresh Inc. OR SELLER SHALL NOT BE HELD LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE HANDLING, STORAGE OR USE OF THIS PRODUCT**

SmartFresh™ is a registered trademark of AgroFresh, Inc./Rohm and Haas Company

AgroFresh Inc.
A Fully-Owned Subsidiary of Rohm and Haas Company
100 Independence Mall West
Philadelphia, PA. 19106
(215) 592-3000

SmartFresh™ SmartTabs	AgroFresh Inc. A subsidiary of Rohm and Haas Company Philadelphia, PA. 19106 Tel: (215) 592-3000
--	---

Active Ingredient:

1-Methylcyclopropene.. 0.63%

Other Ingredients: 99.37%

Total: 100.0%

EPA REGISTRATION NO. 71297-3

EPA EST. NO. 707-WA-001

NOTICE: Before using this product, read the entire Precautionary Statements, Conditions of Sale and Warranty, Directions for Use, Use Restrictions and Storage and Disposal Instructions. If the Conditions of Sale and Warranty are not acceptable, return the product and its generating system unopened and unused within thirty days of purchase to the place of purchase.

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

Net Contents: 10 tablets (12.5 g)

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Causes slight eye irritation. Harmful if absorbed through skin. Avoid contact with eyes. Avoid breathing vapor. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators of this product must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Safety glasses or goggles

Applicators and handlers must follow manufacturer's instructions for cleaning / maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your state or tribe, consult the agency responsible for pesticide regulation. All applicable directions, restrictions, precautions and conditions of sale and warranty are to be followed. This labeling must be in the user's possession during application.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Workers Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas prior to venting the volatile active ingredient from the treatment room and during the REI of 30 minutes after the room has been vented.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, prior to venting the volatile active ingredient from the treatment room is:

- Coveralls
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P, or HE prefilter.

GENERAL INFORMATION

SmartFresh™ is a unique postharvest tool for counteracting many of the undesirable effects of both internal (produced within the fruit **or vegetable**) and external sources of ethylene on harvested fruit **and vegetables**. By counteracting ethylene, SmartFresh™ provides many benefits to the fruit **and vegetables** during transport and storage including:

- Maintaining firmness
- Maintaining titratable acidity
- Preventing superficial scald and soft scald on apples
- Reducing internal ethylene production

- Protection from external sources of ethylene
- Reducing respiration
- Delaying ripening and senescence
- Reducing incidence of peel greasiness in apples
- Reducing incidence of core flush and mealiness in apples
- Reducing chilling injury

SmartFresh™ can be used immediately after harvest, prior to storage, prior to shipment or just prior to sale. SmartFresh™ is effective under both cool (below 55 °F, 13 °C) and warm (above 55°F, 13°C) temperature conditions. To realize maximum benefit in controlling senescence, fruits **and vegetables** should be treated as soon as possible after harvest.

Harvested fruit **and vegetables** must be exposed to the volatile active ingredient of SmartFresh™ in enclosed areas, such as storage rooms, greenhouses, coolers, shipping containers, enclosed truck trailers, or ambient temperature, refrigerated, or controlled atmosphere food storage facilities. This product is not intended for use outdoors or in other non-enclosed areas. These enclosed treatment areas should be gas tight as leakage will reduce SmartFresh™'s effectiveness.

Fruit **And Vegetable Storage Conditions**

SmartFresh™ is compatible with and complementary to both controlled atmosphere and regular air fruit **and vegetable** storage conditions. SmartFresh™ must be used in air tight storage areas.

Timing of Application

SmartFresh™ can be added to the storage area containing fruit **or vegetables** immediately after harvest, upon entering storage, during distribution or in transit. After application, fruit **or vegetables** not for immediate sale must be stored according to good standard commercial practices. It must be emphasized that maintaining the cold chain (keeping the fruit **and vegetables** cool at all times) and strict adherence to phytosanitary practices remain essential in maintaining safe and high quality fruit **and vegetables**.

Apples: Apply SmartFresh™ soon after harvest. Best results are obtained when fruit is at the optimum maturity level for long term storage. For optimum quality, store apples that are to be held longer than six months in a controlled atmosphere.

Avocados: Apply SmartFresh™ to the fruit soon after harvest at the physiological maturity stage or just prior to the "turning black" stage.

Bananas: Apply SmartFresh™ after the bananas have been exposed to ethylene and prior to reaching color stage 4.

Broccoli: Apply SmartFresh™ as soon after harvest as possible.

Melons: Apply SmartFresh™ as soon after harvest as possible.

Tomatoes: Apply SmartFresh™ between color stage mature green (Color Stage 1) and light red (Color Stage 5).

Application Method

Prior to application, ensure that the treatment area can be properly and promptly sealed following application. SmartFresh™ SmartTabs are used in conjunction with the SmartFresh™ Activator Kit. SmartFresh™ SmartTabs are **Green** tablets that, when mixed with **Blue** Activator Tablets in a proprietary Activator Solution, release the volatile active ingredient 1-methylcyclopropene (1-MCP). Make sure that you have a sufficient supply of both SmartFresh™ SmartTabs and SmartFresh™ Activator Kits available to treat your selected treatment area.

Step 1: Selection of the appropriate number of SmartTabs and SmartTab Activator Kits for use

a.) Accurately determine the volume of your EMPTY treatment area in cubic feet. Multiply inside dimensions: volume = length X width X height.

b.) Choose the correct number of **Green** SmartFresh™ SmartTabs from Table 1 below according to the size of the area and the crop to be treated.

Table 1. Number of **Green** SmartTabs Required

Volume of Treatment Area ft ³	Avocado Banana	Melon Tomato	Apple Broccoli
706 to 882	2	3	6
883 to 1058	3	4	8
1059 to 1235	3	5	9
1236 to 1412	4	6	11
1413 to 1588	4	6	12
1589 to 1765	5	7	14
1766 to 1941	5	8	15
1942 to 2118	5	9	17
2119 to 2294	6	9	19
2295 to 2471	6	10	20
2472 to 2648	7	11	22
2649 to 2824	7	12	23
2825 to 3001	8	12	25
3002 to 3177	8	13	26
3178 to 3354	9	14	28
3355 to 3530	9	15	29
3531 to 3707	9	15	31
3708 to 3884	10	16	32
3885 to 4060	10	17	34
4061 to 4237	11	18	36
4238 to 4413	11	18	37
4414 to 4590	12	19	39
4591 to 4766	12	20	40
4767 to 4943	13	21	42
4944 to 5120	13	21	43
5121 to 5296	14	22	45

Never use more than ten (10) **Green** SmartFresh™ SmartTabs per activator kit. If more than ten (10) **Green** SmartFresh™ SmartTabs are needed, you must divide them among two (2) or more SmartFresh™ Activator Kits. Each Kit activates up to 10 SmartFresh™ SmartTabs only.

Always use two (2) Blue tablets for EACH Release Kit.

Table 1. Number of **Green** SmartTabs Required
Continued

Volume of Treatment Area ft ³	Avocado Banana	Melon Tomato	Apple Broccoli
5297 to 5473	14	23	46
5474 to 5649	14	24	48
5650 to 5826	15	24	49
5827 to 6002	15	25	51
6003 to 6179	16	26	53
6180 to 6356	16	27	54
6357 to 6532	17	27	56
6533 to 6709	17	28	57
6710 to 6885	18	29	59
6886 to 7062	18	30	60
7063 to 7239	18	30	62
7240 to 7415	19	31	63
7416 to 7592	19	32	65
7593 to 7768	20	33	67
7769 to 7945	20	33	68
7946 to 8121	21	34	70
8122 to 8298	21	35	71
8299 to 8475	22	36	73
8476 to 8651	22	37	74
8652 to 8828	23	37	76
8829 to 9004	23	38	77
9005 to 9181	23	39	79
9182 to 9357	24	39	80
9358 to 9534	24	40	82
9535 to 9711	25	41	84
9712 to 9887	25	42	85
9888 to 10064	26	42	87
10065 to 10240	26	43	88
10241 to 10417	27	44	90
10418 to 10593	27	45	91
10594 to 10770	27	45	93
10771 to 10947	28	46	94

Never use more than ten (10) **Green** SmartFresh™ SmartTabs per activator kit.
If more than ten (10) **Green** SmartFresh™ SmartTabs are needed, you must divide them among two (2) or more SmartFresh™ Activator Kits. Each Kit activates up to 10 SmartFresh™ SmartTabs only.

Always use two (2) Blue tablets for EACH Release Kit.

Step 2. Evaluation Of The Quality Of The Treatment Room / Trailer / Container

To be used with SmartFresh™, rooms/containers/trailers must be gas tight and have an internal fan for mixing the atmosphere.

Check that:

- All Room/Trailer/Container drain holes are plugged
- There are no holes in the walls, ceiling, or floor
- All vents to outside air are closed
- When viewed from a dark interior, no outside light is visible
- Door seals are in EXCELLENT condition
 - No missing rubber No large cracks
 - No plastic slat doors No roller top doors
 - No side doors
- Scrubbers and/or ozone generators are off

Step 3: Fill the treatment room with the fruit or vegetables to be treated

Step 4: Release of 1-MCP

- a) Remove the pack of two (2) Blue SmartFresh™ Activator Tablets from the foam block.
Always use both Blue tablets.
- b) Remove the appropriate number of **Green** SmartTabs from the SmartFresh™ SmartTabs Package.
- c) Peel off the foil seal from the SmartFresh™ Activator Solution taking care not to spill the solution.
- d) Add both the **Blue** and **Green** Tablets to the Activator Solution.
- e) Replace the cap.
- f) Place the small container on a level surface e.g. in the bottom gap of the pallet. Keep the container upright.
- g) Exit the treatment room immediately and promptly close the doors and ensure they are tightly sealed in order to contain the SmartFresh™ and ensure its maximum efficacy. The release of SmartFresh™ to the area will start several minutes after addition of the SmartTabs to the Activator Solution.
- h) Circulate air in the room by means of the internal air circulation system for AT LEAST one (1) hour.
- i) Do not open the doors for AT LEAST twelve (12) hours.
- j) For controlled atmosphere storage containers or storage rooms, do not change the room atmosphere to controlled atmosphere conditions for AT LEAST twelve (12) hours.

Step 5: Reentry To The Storage Area

At the end of the SmartFresh™ treatment period, vent the treated room by opening the doors for a minimum of thirty minutes with continued full internal ventilation before allowing workers to

enter. At the end of the room venting, remove the SmartFresh™ Activator Solution and dispose of it as non-hazardous waste on-site or at an approved waste disposal facility. Treated fruit **or vegetables** not intended for immediate sale should be stored according to standard commercial practices, in either refrigerated air or controlled atmosphere conditions.

Restrictions

Maximum season use rate: One application with appropriate number of tablets

Do not smoke during the SmartFresh™ application.

Do not treat fruit **or vegetables** stressed from poor fertility, heat, drought or sunscald

Do not treat fruit that have had a pre-harvest application of ethephon.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in original packaging in a cool, dry place.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse or equivalent. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

CONDITIONS OF SALE AND WARRANTY

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AgroFresh Inc.
A Fully-Owned Subsidiary of Rohm and Haas Company
100 Independence Mall West
Philadelphia, PA. 19106
(215) 592-3000

Fee for Service

This package includes the following

☐ New Registration

☒ Amendment

☐ Waiver Request and type

☐ 100% ☐ 50% ☐ IR-4 ☐ Minor ☐ Fed/state

for Division

☐ RD

☐ AD

☒ BPPD

Risk Mgr.

90

Receipt Nos. S-

778851

EPA File Symbol/Reg. No.

7/297-3

Pin-Punch Date:

5-12-05

☒ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount due: \$

Parent/Child Decisions:

☐ Voluntary Payment Request

% Reduction

Reviewer:

Date:

5/13/05

Remarks: (use back if needed)

NON PRTA



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

May 16, 2005

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

ROBERT H. LARKIN
AGRO FRESH INC.
C/O ROHM AND HAAS COMPANY
100 INDEPENDENCE MALL WEST
PHILADELPHIA, PA 19105

PRODUCT NAME: SMARTFRESH SMARTTABS
COMPANY NAME: AGRO FRESH INC.
EPA FILE SYMBOL: 71297-3
EPA RECEIPT DATE: 05/12/05

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Biologicals & Pollution Prevention Division, PM Team 90, at (703) 308-8712.

Sincerely,

A handwritten signature in cursive script, appearing to read "D. K. Moore".

Front End Processing Staff
Information Services Branch
Information Resources and Services Division

May 10, 2005

Mr. Driss Benmhend
Office Of Pesticide Programs (7511C)
Biopesticides and Pollution Prevention Division
U.S. Environmental Protection Agency
Room 910, Crystal Mall 2
1801 South Bell Street
Arlington, VA 22202-4501

Dear Mr. Benmhend:

Re: SmartFresh™ SmartTabs
EPA Registration Number 71297-3
Active Ingredient = 1-methylcyclopropene
Amendment to Add Broccoli to the Label

Enclosed is an application to amend the label of SmartFresh™ SmartTabs by adding broccoli to the label. AgroFresh Inc. requests a waiver for the submission of additional residue data to support this application based on the following:

1. The active ingredient in SmartFresh™ SmartTabs, 1-Methylcyclopropene (1-MCP), is already approved for use on a variety of fruits, including apples, melons, stone fruit, tomatoes, avocados and bananas. The initial approval for 1-MCP was granted based on a C¹⁴ 1-MCP apple residue study that demonstrated that no residues of 1-MCP are detectable on apples when 1-MCP was used at a maximum treatment rate of 1 ppm (v/v). This experimental finding was in agreement with worst case calculations showing that, due to the extremely low use rate of 1-MCP, no residues would be detectable on apples. This same conclusion of no detectable residues was accepted to apply to a variety of fruits for the postharvest use of 1-MCP at a maximum 1 ppm (v/v) use rate.
2. Based on this conclusion and the relatively low toxicity of 1-MCP, 1-MCP was exempt from the requirements of a tolerance when used in the postharvest treatment of all fruits and vegetables.

AgroFresh™

727 Norristown Road, P.O. Box 904, Spring House, PA 19477-0904
www.smartfresh.com • (USA) 866-206-1001 • (INT) +1 215-641-7000

Mr. Driss Benmhend
May 10, 2005

2

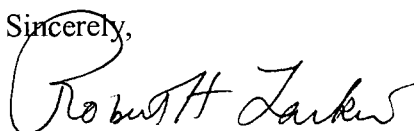
3. The use pattern (indoor, postharvest), application method, use rate of 1 ppm (v/v) maximum, and number of applications (1) proposed for broccoli are the same as for apples.

Since no detectable residues of 1-MCP would be expected on broccoli from the maximum proposed use rate of 1 ppm (v/v), AgroFresh Inc. requests a waiver from the requirement to submit residue data on broccoli.

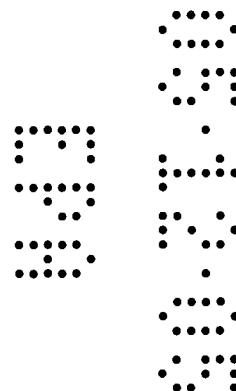
I have enclosed three draft copies of the label which includes broccoli. The proposed changes to the current EPA-approved label for SmartFresh™ SmartTabs are shown in red.

The addition of broccoli to the SmartFresh™ SmartTabs label will be a valuable tool to broccoli shippers and packers as well as consumers since the product will maintain the harvest picked quality of broccoli for longer transit and storage times. I would appreciate a rapid review and approval of this amended label. Please forward a copy of the stamped, approved label following EPA approval. Thank you.

Sincerely,



Robert H. Larkin, Ph.D.





United States
Environmental Protection Agency
 Washington, DC 20460

<input type="checkbox"/>	Registration	OPP Identifier Number
<input checked="" type="checkbox"/>	Amendment	
<input type="checkbox"/>	Other	

Application for Pesticide - Section I

1. Company/Product Number 71297-3	2. EPA Product Manager Driss Benmhend	3. Proposed Classification None X Restricted
4. Company/Product (Name) SmartFresh™ SmartTabs	PM#	
5. Name and Address of Applicant (Include Zip Code) AgroFresh Inc./Rohm and Haas Company 100 Independence Mall West Philadelphia, PA 19106-2399 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> "Me Too" Application.
	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

This amendment is to add broccoli to the label of SmartFresh SmartTabs. No data is required to support this amendment because:

1. The use pattern (postharvest, indoor) and application method are already approved for a number of other fruits.
2. The maximum proposed use rate, 1 ppm (v/v), is the same as the approved rate for apples
3. 1-MCP has an exemption from the requirements of a tolerance when used as a postharvest treatment for all fruits and vegetables.

Section - III**1. Material This Product Will Be Packaged In:**

Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Package wgt. container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) Blister Pack _____
* Certification must be submitted			
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container Blister pack containing ten tablets	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input checked="" type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name Robert H. Larkin	Title President, Regulatory Solutions, LLC	Telephone No. (Include Area Code) 215-284-5702
--------------------------	---	---

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature

3. Title

President, Regulatory Solutions, LLC

6. Date Application Received

(Stamped)

4. Typed Name

Robert H. Larkin

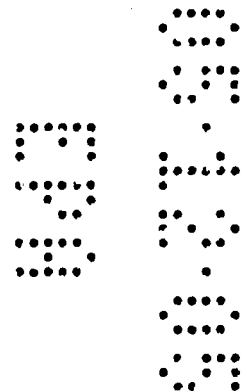
5. Date

May 9, 2005

EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete.

White - EPA File Copy (original)

Yellow - Applicant Copy



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

759323 | 300
 TG | 17

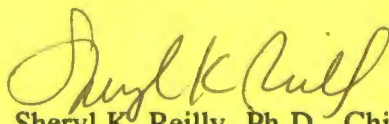
Dr. Robert H. Larkin
 Agro Fresh Inc.
 A Rohm and Haas Company
 100 Independence Mall West
 Philadelphia, PA 19105

Subject: Label Amendment Application dated 4-22-04
 Product Name: SmartFresh SmartTabs
 EPA Registration Number: 71297-3

Dear Dr. Larkin:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy of the label is enclosed for your records. At your next label printing, please submit three copies of the final printed label.

Sincerely,


 Sheryl K. Reilly, Ph.D., Chief
 Biochemical Pesticides Branch
 Biopesticides and Pollution
 Prevention Division (7511C)

Enclosure

CONCURRENCES							
SYMBOL	7511C	7511C	7511C				
SURNAME	Gibbons	Hollis	Reilly				
DATE	6/2/04	10-5-04	6-9-04				

SmartFresh™ SmartTabs	AgroFresh Inc. A subsidiary of Rohm and Haas Company Philadelphia, PA. 19106 Tel: (215) 592-3000
--------------------------	---

Active Ingredient:

1-Methylcyclopropene..... 0.63%

Other Ingredients: 99.37%

Total: 100.0%

EPA REGISTRATION NO. 71297-3

EPA EST. NO. 707-WA-001

NOTICE: Before using this product, read the entire Precautionary Statements, Conditions of Sale and Warranty, Directions for Use, Use Restrictions and Storage and Disposal Instructions. If the Conditions of Sale and Warranty are not acceptable, return the product and its generating system unopened and unused within thirty days of purchase to the place of purchase.

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

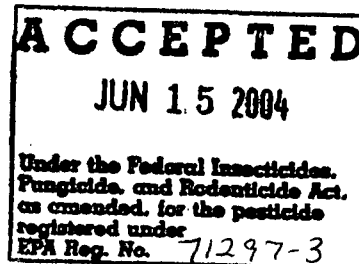
IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

Net Contents: 10 tablets (12.5 g)



PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Causes slight eye irritation. Harmful if absorbed through skin. Avoid contact with eyes. Avoid breathing vapor. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators of this product must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Safety glasses or goggles

Applicators and handlers must follow manufacturer's instructions for cleaning / maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your state or tribe, consult the agency responsible for pesticide regulation. All applicable directions, restrictions, precautions and conditions of sale and warranty are to be followed. This labeling must be in the user's possession during application.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Workers Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas prior to venting the volatile active ingredient from the treatment room and during the REI of 30 minutes after the room has been vented.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, prior to venting the volatile active ingredient from the treatment room is:

- Coveralls
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P, or HE prefilter.

GENERAL INFORMATION

SmartFresh™ is a unique postharvest tool for counteracting many of the undesirable effects of both internal (produced within the fruit) and external sources of ethylene on harvested fruit. By counteracting ethylene, SmartFresh™ provides many benefits to the fruit during transport and storage including:

- Maintaining firmness
- Maintaining titratable acidity
- Preventing superficial scald and soft scald on apples
- Reducing internal ethylene production

- Protection from external sources of ethylene
- Reducing respiration
- Delaying ripening and senescence
- Reducing incidence of peel greasiness in apples
- Reducing incidence of core flush and mealiness in apples
- Reducing chilling injury

SmartFresh™ can be used immediately after harvest, prior to storage, prior to shipment or just prior to sale. SmartFresh™ is effective under both cool (below 55 °F, 13 °C) and warm (above 55°F, 13°C) temperature conditions. To realize maximum benefit in controlling senescence, fruits should be treated as soon as possible after harvest.

Harvested fruits must be exposed to the volatile active ingredient of SmartFresh™ in enclosed areas, such as storage rooms, greenhouses, coolers, shipping containers, enclosed truck trailers, or ambient temperature, refrigerated, or controlled atmosphere food storage facilities. This product is not intended for use outdoors or in other non-enclosed areas. These enclosed treatment areas should be gas tight as leakage will reduce SmartFresh™'s effectiveness.

Fruit Storage Conditions

SmartFresh™ is compatible with and complementary to both controlled atmosphere and regular air fruit storage conditions. SmartFresh™ must be used in air tight storage areas.

Timing of Application

SmartFresh™ can be added to the storage area containing fruit immediately after harvest, upon entering storage, during distribution or in transit. After application, fruit not for immediate sale must be stored according to good standard commercial practices. It must be emphasized that maintaining the cold chain (keeping the fruit cool at all times) and strict adherence to phytosanitary practices remain essential in maintaining safe and high quality fruit.

Apples: Apply SmartFresh™ soon after harvest. Best results are obtained when fruit is at the optimum maturity level for long term storage. For optimum quality, store apples that are to be held longer than six months in a controlled atmosphere.

Avocados: Apply SmartFresh™ to the fruit soon after harvest at the physiological maturity stage or just prior to the "turning black" stage.

Bananas: Apply SmartFresh™ after the bananas have been exposed to ethylene and prior to reaching color stage 4.

Melons: Apply SmartFresh™ as soon after harvest as possible.

Tomatoes: Apply SmartFresh™ between color stage mature green (Color Stage 1) and light red (Color Stage 5).

Application Method

Prior to application, ensure that the treatment area can be properly and promptly sealed following application. SmartFresh™ SmartTabs are used in conjunction with the SmartFresh™ Activator Kit. SmartFresh™ SmartTabs are **Green** tablets that, when mixed with **Blue** Activator Tablets in a proprietary Activator Solution, release the volatile active ingredient 1-methylcyclopropene (1-MCP). Make sure that you have a sufficient supply of both SmartFresh™ SmartTabs and SmartFresh™ Activator Kits available to treat your selected treatment area.

Step 1: Selection of the appropriate number of SmartTabs and SmartTab Activator Kits for use

a.) Accurately determine the volume of your EMPTY treatment area in cubic feet. Multiply inside dimensions: volume = length X width X height.

b.) Choose the correct number of **Green** SmartFresh™ SmartTabs from Table 1 below according to the size of the area and the crop to be treated.

Table 1. Number of **Green SmartTabs** Required

Volume of Treatment Area ft ³	Avocado Banana	Melon Tomato	Apple
706 to 882	2	3	6
883 to 1058	3	4	8
1059 to 1235	3	5	9
1236 to 1412	4	6	11
1413 to 1588	4	6	12
1589 to 1765	5	7	14
1766 to 1941	5	8	15
1942 to 2118	5	9	17
2119 to 2294	6	9	19
2295 to 2471	6	10	20
2472 to 2648	7	11	22
2649 to 2824	7	12	23
2825 to 3001	8	12	25
3002 to 3177	8	13	26
3178 to 3354	9	14	28
3355 to 3530	9	15	29
3531 to 3707	9	15	31
3708 to 3884	10	16	32
3885 to 4060	10	17	34
4061 to 4237	11	18	36
4238 to 4413	11	18	37
4414 to 4590	12	19	39
4591 to 4766	12	20	40
4767 to 4943	13	21	42
4944 to 5120	13	21	43
5121 to 5296	14	22	45

Never use more than ten (10) **Green SmartFresh™** SmartTabs per activator kit.
 If more than ten (10) **Green SmartFresh™** SmartTabs are needed, you must divide them among
 two (2) or more SmartFresh™ Activator Kits. Each Kit activates up to 10 SmartFresh™
 SmartTabs only.
Always use two (2) Blue tablets for EACH Release Kit.

Table 1. Number of **Green** SmartTabs Required
Continued

Volume of Treatment Area ft ³	Avocado Banana	Melon Tomato	Apple
5297 to 5473	14	23	46
5474 to 5649	14	24	48
5650 to 5826	15	24	49
5827 to 6002	15	25	51
6003 to 6179	16	26	53
6180 to 6356	16	27	54
6357 to 6532	17	27	56
6533 to 6709	17	28	57
6710 to 6885	18	29	59
6886 to 7062	18	30	60
7063 to 7239	18	30	62
7240 to 7415	19	31	63
7416 to 7592	19	32	65
7593 to 7768	20	33	67
7769 to 7945	20	33	68
7946 to 8121	21	34	70
8122 to 8298	21	35	71
8299 to 8475	22	36	73
8476 to 8651	22	37	74
8652 to 8828	23	37	76
8829 to 9004	23	38	77
9005 to 9181	23	39	79
9182 to 9357	24	39	80
9358 to 9534	24	40	82
9535 to 9711	25	41	84
9712 to 9887	25	42	85
9888 to 10064	26	42	87
10065 to 10240	26	43	88
10241 to 10417	27	44	90
10418 to 10593	27	45	91
10594 to 10770	27	45	93
10771 to 10947	28	46	94

Never use more than ten (10) **Green** SmartFresh™ SmartTabs per activator kit.
If more than ten (10) **Green** SmartFresh™ SmartTabs are needed, you must divide them among two (2) or more SmartFresh™ Activator Kits. Each Kit activates up to 10 SmartFresh™ SmartTabs only.

Always use two (2) Blue tablets for EACH Release Kit.

Step 2. Evaluation Of The Quality Of The Treatment Room / Trailer / Container

To be used with SmartFresh™, rooms/containers/trailers must be gas tight and have an internal fan for mixing the atmosphere.

Check that:

- All Room/Trailer/Container drain holes are plugged
- There are no holes in the walls, ceiling, or floor
- All vents to outside air are closed
- When viewed from a dark interior, no outside light is visible
- Door seals are in EXCELLENT condition
 - No missing rubber No large cracks
 - No plastic slat doors No roller top doors
 - No side doors
- Scrubbers and/or ozone generators are off

Step 3: Fill the treatment room with the fruit to be treated

Step 4: Release of 1-MCP

- a) Remove the pack of two (2) Blue SmartFresh™ Activator Tablets from the foam block.
Always use both Blue tablets.
- b) Remove the appropriate number of **Green** SmartTabs from the SmartFresh™ SmartTabs Package.
- c) Peel off the foil seal from the SmartFresh™ Activator Solution taking care not to spill the solution.
- d) Add both the **Blue** and **Green** Tablets to the Activator Solution.
- e) Replace the cap.
- f) Place the small container on a level surface e.g. in the bottom gap of the pallet. Keep the container upright.
- g) Exit the treatment room immediately and promptly close the doors and ensure they are tightly sealed in order to contain the SmartFresh™ and ensure its maximum efficacy. The release of SmartFresh™ to the area will start several minutes after addition of the SmartTabs to the Activator Solution.
- h) Circulate air in the room by means of the internal air circulation system for AT LEAST one (1) hour.
- i) Do not open the doors for AT LEAST twelve (12) hours.
- j) For controlled atmosphere storage containers or storage rooms, do not change the room atmosphere to controlled atmosphere conditions for AT LEAST twelve (12) hours.

Step 5: Reentry To The Storage Area

At the end of the SmartFresh™ treatment period, vent the treated room by opening the doors for a minimum of thirty minutes with continued full internal ventilation before allowing workers to

enter. At the end of the room venting, remove the SmartFresh™ Activator Solution and dispose of it as non-hazardous waste on-site or at an approved waste disposal facility. Treated fruit not intended for immediate sale should be stored according to standard commercial practices, in either refrigerated air or controlled atmosphere conditions.

Restrictions

Maximum season use rate: One application with appropriate number of tablets

Do not smoke during the SmartFresh™ application.

Do not treat fruit stressed from poor fertility, heat, drought or sunscald

Do not treat fruit that have had a pre-harvest application of ethephon.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in original packaging in a cool, dry place.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse or equivalent. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

CONDITIONS OF SALE AND WARRANTY

AgroFresh Inc. warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label only when used in accordance with label directions under normal conditions of use. AgroFresh Inc. **MAKES NO OTHER EXPRESS OR IMPLIED WARRANTIES EITHER OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE.** Handling, storage and use of the product by Buyer or User are beyond the control of AgroFresh Inc. and Seller. Risks such as crop injury, ineffectiveness or other unintended consequences resulting from, but not limited to, weather or soil conditions, presence of other materials, disease, pests, drift to other crops or property, or failure to follow label directions will be assumed by the Buyer or User. **TO THE FULLEST EXTENT PERMITTED BY LAW, AgroFresh Inc. OR SELLER SHALL NOT BE HELD LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE HANDLING, STORAGE OR USE OF THIS PRODUCT**

SmartFresh™ is a registered trademark of AgroFresh, Inc./Rohm and Haas Company

AgroFresh Inc.
A Fully-Owned Subsidiary of Rohm and Haas Company
100 Independence Mall West
Philadelphia, PA. 19106
(215) 592-3000

EPA Reg. No.: 71297-3
 RAL: Tasha Gibbons

BPPD Label Amendment Check List

Application Date: 4-22-04

Internal BBPD Guidance Document - Other Items May be Required Updated 7/02

No.	Check List Item	Yes	No
1.	Application Form (EPA Form 8570-1) -signed & complete including package type? If NO, STOP! Call applicant and have them correct application and resubmit.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
1a.	Fast-Track?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2.	Amendment covered by PR-Notice 98-10 (Notifications)? If YES, STOP. Call applicant and inform them that this submission will be converted to a notification. After closing-out in PRATS, forward to Notification Review Coordinator.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3.	Final printed labeling received for previous action? If NO, Stop! E-mail applicant and request final printed labeling (FPL). Inform them that FPL from the last accepted label is needed to support the current application. File e-mail as record of notification. Log out of PRATS (label deficiency).	<input type="checkbox"/>	<input type="checkbox"/>
4.	Data and Data Matrix (EPA Form 8570-35)	(NA)	
	a) using Selective Method? [If NO, (Data Matrix not required), skip to Item 5.]	<input type="checkbox"/>	<input type="checkbox"/>
	1) Complete Data Matrix. Minimum Data Matrix for registration includes: Product specific acute tox and product chemistry data, plus Efficacy data for Public Health pests claimed on label.	<input type="checkbox"/>	<input type="checkbox"/>
	b) Adequate Product Specific data	<input type="checkbox"/>	<input type="checkbox"/>
	c) Registered source used for active ingredient? If Yes, active ingredient is from a registered source and generic data should be satisfied by registered source. Skip to Item 5. If No, generic data is necessary.	<input type="checkbox"/>	<input type="checkbox"/>
	d) Data passed 86-5? (Data formatting PR Notice)	<input type="checkbox"/>	<input type="checkbox"/>
	e) Public copy of Matrix provided? (As required by PRN-98-5)	<input type="checkbox"/>	<input type="checkbox"/>
5.	Certification with Respect to Citation of Data (EPA Form 8570-34) See 40 CFR 152.80-98 and PR Notice 98-5 [Note: If no data are required or submitted, a Certification with Respect to Citation of Data form is not needed. This is often true for minor amendments.]	(NA)	
	a) Did applicant check a Method of Support?	<input type="checkbox"/>	<input type="checkbox"/>
	b) General Offer to Pay checked for Cite-all Method or Cite-all under Selective Method?	<input type="checkbox"/>	<input type="checkbox"/>
	c) Is the form signed and dated?	<input type="checkbox"/>	<input type="checkbox"/>
	d) Check form and Data Matrix; are Exclusive Use data cited from other sources?	<input type="checkbox"/>	<input type="checkbox"/>
	1.) If Yes, is the required authorization letter included in application?	<input type="checkbox"/>	<input type="checkbox"/>
6.	Label(s) Review Date of Label Review: <u>5-13-04</u> Bob Torla Concurrence for OMRI Logo: _____		
a.	Label(s) agrees with current Label Review Manual and appropriate REDS	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	Labeling from acute tox, product chemistry, and efficacy data (Public Health pests)	<input type="checkbox"/>	<input type="checkbox"/>
c.	Nominal concentration of active ingredient shown in ingredients statement	<input type="checkbox"/>	<input type="checkbox"/>
d.	Viability included as substatement of Ingredient Statement (if live microbial, e.i., cfu/gram)	<input type="checkbox"/>	<input type="checkbox"/>
e.	Storage and disposal instructions agree with container types listed on application form	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f.	Unique Product Name for Same Company (Check REFS)	<input type="checkbox"/>	<input type="checkbox"/>
g.	Labeling is acceptable. Corrections or changes are NOT necessary.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

NON FEE ITEM

DIVISION: Biopesticides and Pollution Prevention

BRANCH:

EPA FILE SYMBOL/REG. NO: 71297-3

PIN PUNCH/START DATE: 4.20-04

BPPD DATE: 4/30/04

PR 86-5 PASS DATE: N/A

ACTION CODE: 300

RAL:

~~Taska Gibbons~~ Taska Gibbons ~~Taska Gibbons~~

REMARKS:

Diana
Taska Skale's
a. Skale's
4/4/04

[Signature]

AIO
MAY 6 2004

[Signature]

NON FEE ITEM

DIVISION: Biopesticides and Pollution Prevention

BRANCH: BPB

EPA FILE SYMBOL/REG. NO: 71297-3

PIN PUNCH/START DATE: 4/28/04

BPPD DATE: 4/29/04

PR 86-5 PASS.DATE: Not Applicable

ACTION CODE: 300 (Fast Track, label

RAL: Driss Bernhend. (amdt.)

REMARKS:

Driss - Even though this is Non-fee,

Please schedule a due date on

your calendar (90 days)

from pin-punch date

SKR



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

April 29, 2004

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

ROBERT H. LARKIN
AGRO FRESH INC.
C/O ROHM AND HAAS COMPANY
100 INDEPENDENCE MALL WEST
PHILADELPHIA, PA 19105

PRODUCT NAME: SMARTFRESH SMARTTABS
COMPANY NAME: AGRO FRESH INC.
EPA FILE SYMBOL: 71297-3
EPA RECEIPT DATE: 04/28/04

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Biologicals & Pollution Prevention Division, PM Team 90, at (703) 308-8712.

Sincerely,

Patricia A. Moore
Front End Processing Staff
Information Services Branch
Information Resources and Services Division



Robert H Larkin
<RLarkin@agrofresh.com>

05/28/04 10:27 AM

To: Tasha Gibbons/DC/USEPA/US@EPA
cc:
Subject: Re: Smart Fresh Smart Tabs, 71297-3

Tasha, see my responses below (in red). Thanks for your comments.

Gibbons.Tasha@epamail.epa.gov

05/27/2004 01:44 PM

To rlarkin@rohmhaas.com
cc
Subject Smart Fresh Smart Tabs, 71297-3

Dear Bob,

My team leader has brought to my attention a few more items that must be addressed with regard to your label for Smart Fresh Smart Tabs before it can be approved. I apologize for not including these comments in my original email to you a few weeks ago.

1) The present warranty statement contains language that is overly broad. Please revise the Warranty statement so that the final sentence reads as follows: "To the fullest extent permitted by law, AgroFresh Inc. or seller shall not be held liable for consequential, special or indirect damages resulting from the handling, storage or use of this product." Refer to Chapter 12 of the Label Review Manual (3rd Edition, August 2003), VI. Warranty and Disclaimer Statements, for unacceptable label language associated with disclaimers, warranties and limitations of liability.

OK

2) The REI must appear in its appropriate place in the Agricultural Use Requirements Box. (LRM, 10-19 and 10-20) Please delete the REI statement from its current location under Restrictions in the Directions for Use Section, and insert it in the Ag. Use Req. Box as follows: "Do not enter or allow worker entry into treated areas prior to venting the volatile active ingredient from the treatment room and during the REI of 30 minutes after the room has been vented."

OK

3) Finally, points h,i, and j under Step 4 in the Directions for Use Section are somewhat confusing. What exactly is meant by "Circulate air in the room for at least one hour." If one is not permitted to enter the room for at least 12 hours, does this mean the air will naturally

circulate for one hour? Or is some sort of fan system turned on?
Fruits and vegetables are always stored in refrigerated storage rooms. These rooms have powerful internal fans that circulate cold air in order to cool the fruits and vegetables down as quickly as possible. The directions are referring to these internal fan systems.

To make the directions more clear, I will change to:

h.) Circulate air in the room by means of the internal air circulation system for AT LEAST one (1) hour

Also,
what exactly is meant by "do not change atmosphere for at least 12 hours" ?

The atmosphere refers to introduction of a controlled atmosphere (CA) used for longer term storage of fruits and vegetables. This controlled atmosphere typically uses nitrogen to lower the oxygen content in the air of the room from the normal 20% to approximately 2% which slows down the respiration and ripening of fruits and vegetables.

To clarify, I will change to:

j.) For controlled atmosphere containers or storage rooms, do not change the room atmosphere to controlled atmosphere conditions for AT LEAST twelve (12) hours.

Please revise these statements so that they are more clear to the user.

Again, I am sorry I did not include these items in my previous email to you. Please revise the label with regard to the above and email me the revised pdf file. Do not hesitate to contact me with any questions or concerns.

Sincerely,
Tasha Gibbons

Tasha T. Gibbons
U.S. Environmental Protection Agency
Biopesticides and Pollution Prevention Division
Office of Pesticide Programs
(703) 308-0022
(703) 308-7026 (fax)
gibbons.tasha@epamail.epa.gov



Robert H Larkin
<RLarkin@agrofresh.com>

05/25/04 02:13 PM

To: Tasha Gibbons/DC/USEPA/US@EPA
cc: Driss Benmhend/DC/USEPA/US@EPA, rlarkin@rohmhaas.com
Subject: Re: Label Amendment Application for Smart Fresh Smart Tabs

Tasha, thanks for your message. I have made the changes you recommended in Points #1,2, and 4. For Point #3, I have added the phrase "For optimum quality..." in front of your recommended phrase as we agreed. The new sentence is in red on the attached label.

Just to repeat what we discussed on the issue of number of tablets, apples are less sensitive than the other crops to 1-MCP and therefore require a higher treatment rate. The rate is just below 1 ppm (v/v) for apples - the same as the rate on the SmartFresh label. For the other crops the rate is either 500 ppb (melons and tomatoes) or 300 ppb (bananas and avocados).

Please mail me a stamped, approved label for submission to the states after you have completed the approval. Thanks for your help.

Gibbons.Tasha@epamail.epa.gov

05/13/2004 01:46 PM

To rlarkin@rohmhaas.com
cc Benmhend.Driss@epamail.epa.gov
Subject Label Amendment Application for Smart Fresh Smart Tabs

Dear Mr. Larkin,

I have reviewed your label amendment application for Smart Fresh Smart Tabs. There are a few minor changes that need to be made before the label can be approved. Please change the following:

- 1) Move the Agricultural Use Requirements box (p.2) as well as the General Information Section (p.3) to the Directions for Use Section. (See 10-19 in 2003 Label Review Manual) The Agricultural Use Requirements box and the General Information Section typically appear right after the first paragraph under the Directions for Use beginning, "It is a violation of federal law...".
- 2) Move the Warranty Statement (p.3) to the end of the label, after the Storage and Disposal Statements.
- 3) On page 4, change the third sentence in the "Apples" section under the heading "Timing of Application," from "Storage in controlled atmosphere is recommended for apples that are to be held longer than six

months" to "Store apples that are to be held longer than six months in a controlled atmosphere." (Per PR Notice 2000-5)

4) On page 4, "Avocadoes" should be spelled "Avocados."

Also, my supervisor Driss Benmend and I were wondering why the number of green smart tabs required for apples is so much greater than the number required for avocados, bananas, melons, and tomatoes, for the same volume of treatment area. . Could you please explain this to us?

Please revise the label with regard to the above. You can either email me the revised label as a pdf file, or send a hard copy through the mail. Please do not hesitate to contact me with any questions or concerns.

Thank you.

Sincerely,
Tasha Gibbons

Tasha T. Gibbons
U.S. Environmental Protection Agency
Biopesticides and Pollution Prevention Division
Office of Pesticide Programs
(703) 308-8370
(703) 308-7026 (fax)



gibbons.tasha@epamail.epa.gov SmartTabslabelfeb2004revAppleDecolorizedRev1.pdf

SmartFresh™ SmartTabs	AgroFresh Inc. A subsidiary of Rohm and Haas Company Philadelphia, PA. 19106 Tel: (215) 592-3000
--	--

Active Ingredient:

1-Methylcyclopropene.. 0.63%

Other Ingredients: 99.37%

Total: 100.0%

EPA REGISTRATION NO. 71297-3

EPA EST. NO. 707-WA-001

NOTICE: Before using this product, read the entire Precautionary Statements, Conditions of Sale and Warranty, Directions for Use, Use Restrictions and Storage and Disposal Instructions. If the Conditions of Sale and Warranty are not acceptable, return the product and its generating system unopened and unused within thirty days of purchase to the place of purchase.

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

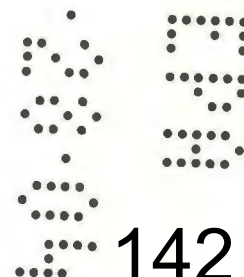
IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

Net Contents: 10 tablets (12.5 g)



PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Causes slight eye irritation. Harmful if absorbed through skin. Avoid contact with eyes. Avoid breathing vapor. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators of this product must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Safety glasses or goggles

Applicators and handlers must follow manufacturer's instructions for cleaning / maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Workers Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas ~~prior to venting the volatile active ingredient from the treatment room.~~

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, prior to venting the volatile active ingredient from the treatment room is:

- Coveralls
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P, or HE prefilter.

move to end - after ST & Disp

CONDITIONS OF SALE AND WARRANTY

AgroFresh Inc. warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label only when used in accordance with label directions under normal conditions of use. AgroFresh Inc. **MAKES NO OTHER EXPRESS OR IMPLIED WARRANTIES EITHER OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE.** Handling, storage and use of the product by Buyer or User are beyond the control of AgroFresh Inc. and Seller. Risks such as crop injury, ineffectiveness or other unintended consequences resulting from, but not limited to, weather or soil conditions, presence of other materials, disease, pests, drift to other crops or property, or failure to follow label directions will be assumed by the Buyer or User. ~~IN NO CASE WILL~~ AgroFresh Inc. **OR SELLER BE HELD LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE HANDLING, STORAGE OR USE OF THIS PRODUCT.**

"To the fullest extent permitted by law AgroFresh Inc. or seller shall not be..."

GENERAL INFORMATION *→ move to after Directions for Use*

SmartFresh™ is a unique postharvest tool for counteracting many of the undesirable effects of both internal (produced within the fruit) and external sources of ethylene on harvested fruit. By counteracting ethylene, SmartFresh™ provides many benefits to the fruit during transport and storage including:

- Maintaining firmness
- Maintaining titratable acidity
- **Preventing superficial scald and soft scald on apples**
- Reducing internal ethylene production
- Protection from external sources of ethylene
- Reducing respiration
- Delaying ripening and senescence
- **Reducing incidence of peel greasiness in apples**
- **Reducing incidence of core flush and meakiness in apples**
- Reducing chilling injury

SmartFresh™ can be used immediately after harvest, prior to storage, prior to shipment or just prior to sale. SmartFresh™ is effective under both cool (below 55 °F, 13 °C) and warm (above 55°F, 13°C) temperature conditions. To realize maximum benefit in controlling senescence, fruits should be treated as soon as possible after harvest.

Harvested fruits must be exposed to the volatile active ingredient of SmartFresh™ in enclosed areas, such as storage rooms, greenhouses, coolers, shipping containers, enclosed truck trailers, or ambient temperature, refrigerated, or controlled atmosphere food storage facilities. This product is not intended for use outdoors or in other non-enclosed areas. These enclosed treatment areas should be gas tight as leakage will reduce SmartFresh™'s effectiveness.

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your state or tribe, consult the agency responsible for pesticide regulation. All applicable directions, restrictions, precautions and conditions of sale and warranty are to be followed. This labeling must be in the user's possession during application.

Fruit Storage Conditions

SmartFresh™ is compatible with and complementary to both controlled atmosphere and regular air fruit storage conditions. SmartFresh™ must be used in air tight storage areas.

Timing of Application

SmartFresh™ can be added to the storage area containing fruit immediately after harvest, upon entering storage, during distribution or in transit. After application, fruit not for immediate sale must be stored according to good standard commercial practices. It must be emphasized that maintaining the cold chain (keeping the fruit cool at all times) and strict adherence to phytosanitary practices remain essential in maintaining safe and high quality fruit.

✓ **Apples:** Apply SmartFresh™ soon after harvest. Best results are obtained when fruit is at the optimum maturity level for long term storage. Storage in controlled atmosphere is recommended for apples that are to be held longer than six months.

Store apples that are to be held longer than six months in a controlled atmosphere

Avocados: Apply SmartFresh™ to the fruit soon after harvest at the physiological maturity stage or just prior to the "turning black" stage.

Bananas: Apply SmartFresh™ after the bananas have been exposed to ethylene and prior to reaching color stage 4.

Melons: Apply SmartFresh™ as soon after harvest as possible.

Tomatoes: Apply SmartFresh™ between color stage mature green (Color Stage 1) and light red (Color Stage 5).

Application Method

Prior to application, ensure that the treatment area can be properly and promptly sealed following application. SmartFresh™ SmartTabs are used in conjunction with the SmartFresh™ Activator Kit. SmartFresh™ SmartTabs are **Green** tablets that, when mixed with **Blue** Activator Tablets in a proprietary Activator Solution, release the volatile active ingredient 1-methylcyclopropene (1-MCP). Make sure that you have a sufficient supply of both SmartFresh™ SmartTabs and SmartFresh™ Activator Kits available to treat your selected treatment area.

Step 1: Selection of the appropriate number of SmartTabs and SmartTab Activator Kits for use

a.) Accurately determine the volume of your EMPTY treatment area in cubic feet. Multiply inside dimensions: volume = length X width X height.

b.) Choose the correct number of **Green SmartFresh™** SmartTabs from Table 1 below according to the size of the area and the crop to be treated.

Table 1. Number of Green SmartTabs Required

Volume of Treatment Area ft³	Avocado Banana	Melon Tomato	Apple
706 to 882	2	3	6
883 to 1058	3	4	8
1059 to 1235	3	5	9
1236 to 1412	4	6	11
1413 to 1588	4	6	12
1589 to 1765	5	7	14
1766 to 1941	5	8	15
1942 to 2118	5	9	17
2119 to 2294	6	9	19
2295 to 2471	6	10	20
2472 to 2648	7	11	22
2649 to 2824	7	12	23
2825 to 3001	8	12	25
3002 to 3177	8	13	26
3178 to 3354	9	14	28
3355 to 3530	9	15	29
3531 to 3707	9	15	31
3708 to 3884	10	16	32
3885 to 4060	10	17	34
4061 to 4237	11	18	36
4238 to 4413	11	18	37
4414 to 4590	12	19	39
4591 to 4766	12	20	40
4767 to 4943	13	21	42
4944 to 5120	13	21	43
5121 to 5296	14	22	45

Never use more than ten (10) **Green SmartFresh™** SmartTabs per activator kit.

If more than ten (10) **Green** SmartFresh™ SmartTabs are needed, you must divide them among two (2) or more SmartFresh™ Activator Kits. Each Kit activates up to 10 SmartFresh™ SmartTabs only.

Always use two (2) Blue tablets for EACH Release Kit.

Table 1. Number of Green SmartTabs Required
Continued

Volume of Treatment Area ft ³	Avocado Banana	Melon Tomato	Apple
5297 to 5473	14	23	46
5474 to 5649	14	24	48
5650 to 5826	15	24	49
5827 to 6002	15	25	51
6003 to 6179	16	26	53
6180 to 6356	16	27	54
6357 to 6532	17	27	56
6533 to 6709	17	28	57
6710 to 6885	18	29	59
6886 to 7062	18	30	60
7063 to 7239	18	30	62
7240 to 7415	19	31	63
7416 to 7592	19	32	65
7593 to 7768	20	33	67
7769 to 7945	20	33	68
7946 to 8121	21	34	70
8122 to 8298	21	35	71
8299 to 8475	22	36	73
8476 to 8651	22	37	74
8652 to 8828	23	37	76
8829 to 9004	23	38	77
9005 to 9181	23	39	79
9182 to 9357	24	39	80
9358 to 9534	24	40	82
9535 to 9711	25	41	84
9712 to 9887	25	42	85
9888 to 10064	26	42	87
10065 to 10240	26	43	88
10241 to 10417	27	44	90
10418 to 10593	27	45	91
10594 to 10770	27	45	93
10771 to 10947	28	46	94

Never use more than ten (10) Green SmartFresh™ SmartTabs per activator kit. If more than ten (10) Green SmartFresh™ SmartTabs are needed, you must divide them among two (2) or more SmartFresh™ Activator Kits. Each Kit activates up to 10 SmartFresh™ SmartTabs only.

Always use two (2) Blue tablets for EACH Release Kit.

Step 2. Evaluation Of The Quality Of The Treatment Room / Trailer / Container

To be used with SmartFresh™, rooms/containers/trailers must be gas tight and have an internal fan for mixing the atmosphere.

Check that:

- All Room/Trailer/Container drain holes are plugged
- There are no holes in the walls, ceiling, or floor
- All vents to outside air are closed
- When viewed from a dark interior, no outside light is visible
- Door seals are in EXCELLENT condition
 - No missing rubber No large cracks
 - No plastic slat doors No roller top doors
 - No side doors
- Scrubbers and/or ozone generators are off

Step 3: Fill the treatment room with the fruit to be treated

Step 4: Release of 1-MCP

- a) Remove the pack of two (2) Blue SmartFresh™ Activator Tablets from the foam block.
Always use both Blue tablets.
- b) Remove the appropriate number of **Green** SmartTabs from the SmartFresh™ SmartTabs Package.
- c) Peel off the foil seal from the SmartFresh™ Activator Solution taking care not to spill the solution.
- d) Add both the **Blue** and **Green** Tablets to the Activator Solution.
- e) Replace the cap.
- f) Place the small container on a level surface e.g. in the bottom gap of the pallet. Keep the container upright.
- g) Exit the treatment room immediately and promptly close the doors and ensure they are tightly sealed in order to contain the SmartFresh™ and ensure its maximum efficacy. The release of SmartFresh™ to the area will start several minutes after addition of the SmartTabs to the Activator Solution.
- h) Circulate air in the room for AT LEAST one (1) hour.
- i) Do not open the doors for AT LEAST twelve (12) hours.
- j) For CA Containers: do not change atmosphere for AT LEAST twelve (12) hours.

*Revise
so this
is more
clear to
user.
(see email
to respondent)*

Step 5: Reentry To The Storage Area

At the end of the SmartFresh™ treatment period, vent the treated room by opening the doors for a minimum of thirty minutes with continued full internal ventilation before allowing workers to enter. At the end of the room venting, remove the SmartFresh™ Activator Solution and dispose of it as non-hazardous waste on-site or at an approved waste disposal facility. Treated fruit not intended for immediate sale should be stored according to standard commercial practices, in either refrigerated air or controlled atmosphere conditions.

Restrictions

Restricted Entry Period (REI): 30 minutes after room has been vented

move to ag. use BOX

Maximum season use rate: One application with appropriate number of tablets

Do not smoke during the SmartFresh™ application.

Do not treat fruit stressed from poor fertility, heat, drought or sunscald

Do not treat fruit that have had a pre-harvest application of ethephon.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

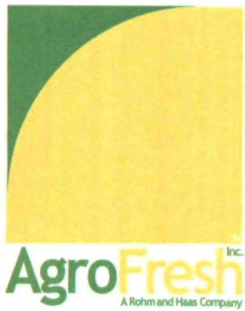
Pesticide Storage: Store in original packaging in a cool, dry place.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse or equivalent. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

SmartFresh™ is a registered trademark of AgroFresh, Inc./Rohm and Haas Company

AgroFresh Inc.
A Fully-Owned Subsidiary of Rohm and Haas Company
100 Independence Mall West
Philadelphia, PA. 19106
(215) 592-3000



April 26, 2004

Mr. Driss Benmhend
Office Of Pesticide Programs (7511C)
Biopesticides and Pollution Prevention Division
U.S. Environmental Protection Agency
Room 910, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202-4501

Dear Mr. Benmhend:

Re: SmartFresh™ SmartTabs
EPA Registration Number 71297-3
Active Ingredient = 1-methylcyclopropene
Amendment to Add Apples to the Label

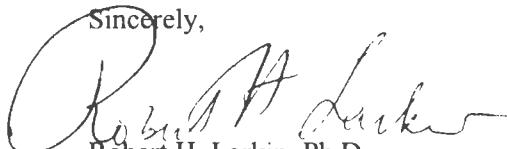
Enclosed is an application to amend the label of SmartFresh™ SmartTabs by adding apples to the label. No data are required to support this amendment since:

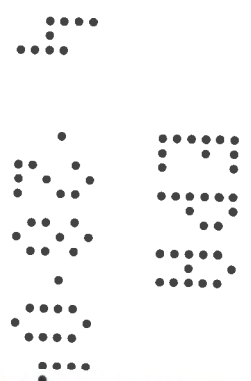
1. Apples are already approved for use on the label of SmartFresh™ (EPA Registration Number 71297-2), a powder formulation of the same active ingredient, 1-methylcyclopropene.
2. The use rate, 1ppm (v/v) maximum, and number of applications (1) are the same as recommended for SmartFresh™
3. The use pattern (indoor, postharvest) and method of application are the same as for SmartFresh™
4. 1-MCP is exempt from the requirements of a tolerance for all fruits and vegetables.

I have enclosed a draft copy of the label which includes apples. The proposed changes to the current EPA-approved label are shown in red.

The addition of apples to the SmartFresh™ SmartTabs label will be valuable to shippers and packers who wish to treat smaller size storage rooms that can be accommodated by SmartFresh™, the currently registered powder formulation. I would appreciate a rapid review and approval of this amended label. Please forward a copy of the stamped, approved label following EPA approval. Thank you.

Sincerely,


Robert H. Larkin, Ph.D.





Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 2-28-95



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 71297-3	2. EPA Product Manager Driss Benmhend	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) SmartFresh SmartTabs	PM#	
5. Name and Address of Applicant (Include ZIP Code) AgroFresh Inc./Rohm and Haas Company 100 Independence Mall West Philadelphia, PA 19106-2399 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

An amendment to add apples to the label of SmartFresh SmartTabs (EPA Registration Number 71297-3). No data are required to support this amendment since:

1. Apples are already approved for use of the label of SmartFresh (71297-2), a powder formulation of the same active ingredient, 1-MCP
2. The use rate, 1 ppm (v/v) maximum, and number of applications (1) are the same as recommended for SmartFresh
3. The use pattern (indoor, postharvest) and method of application are the same as for SmartFresh
4. 1-MCP is exempt from the requirements of a tolerance for all fruits and vegetables

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input checked="" type="checkbox"/> Plastic	
				<input checked="" type="checkbox"/> Glass	
				<input checked="" type="checkbox"/> Paper	
				<input checked="" type="checkbox"/> Other (Specify) Blister pack	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container Blister pack containing 10 tablets		5. Location of Label Directions <input type="checkbox"/> Booklet attached to blister pack	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Robert H. Larkin		Title President, Regulatory Solutions, LLC		Telephone No. (Include Area Code) 215-641-7933	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title President, Regulatory Solutions, LLC			
4. Typed Name Robert H. Larkin		5. Date April 22, 2004			



U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Biopesticides and Pollution Prevention Division (7501W)
401 "M" St., S.W.
Washington, D.C. 20460

EPA Reg.
Number
71297-3

Date of Issuance:
3/5/04

Term of Issuance
Unconditional

Name of Pesticide Product
SmartFresh™ SmartTabs

NOTICE OF PESTICIDE:

☒ Registration
☐ Reregistration

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

**AgroFresh, Inc.
100 Independence Mall West
Philadelphia, PA 19106**

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Biopesticides and Pollution Prevention Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is unconditionally registered in accordance with FIFRA sec. 3(c)(5) subject to the comments listed below:

1. Make the following label changes:

a. Add the phrase "EPA Registration No. 71297-3 to your label before you release the product for shipment

b. Add the appropriate Establishment Number to your label before you release the product for shipment

2. Submit five copies of the final printed labeling before you release this product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec.6(e). Your release for shipment of the product constitutes acceptance of these conditions.

Unconditional registration does not eliminate the need for continual reassessment of a pesticide. If EPA determines, at any time, that additional data are required to maintain in effect, an existing registration, the Agency will require submission of such data under Section 3(c)(2)(B) of FIFRA.

Signature of the Approving Official

Janet L. Anderson

3/5/04

SmartFresh™ SmartTabs	AgroFresh Inc. A subsidiary of Rohm and Haas Company Philadelphia, PA. 19106 Tel: (215) 592-3000
--	---

Active Ingredient:

1-Methylcyclopropene..... 0.63%

Other Ingredients: 99.37%

Total: 100.0%

EPA REGISTRATION NO. 71297-xx

EPA EST. NO. XX-XXXXX-XX

NOTICE: Before using this product, read the entire Precautionary Statements, Conditions of Sale and Warranty, Directions for Use, Use Restrictions and Storage and Disposal Instructions. If the Conditions of Sale and Warranty are not acceptable, return the product and its generating system unopened and unused within thirty days of purchase to the place of purchase.

KEEP OUT OF REACH OF CHILDREN
CAUTION

FIRST AID

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

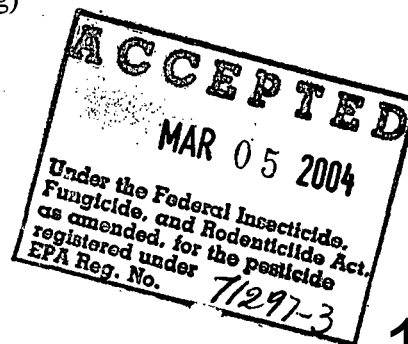
IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

Net Contents: 10 tablets (12.5 g)



PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Causes slight eye irritation. Harmful if absorbed through skin. Avoid contact with eyes. Avoid breathing vapor. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators of this product must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Safety glasses or goggles

Applicators and handlers must follow manufacturer's instructions for cleaning / maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Workers Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas prior to venting the volatile active ingredient from the treatment room.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, prior to venting the volatile active ingredient from the treatment room is:

- Coveralls
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P, or HE prefilter.

CONDITIONS OF SALE AND WARRANTY

AgroFresh Inc. warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label only when used in accordance with label directions under normal conditions of use. AgroFresh Inc. **MAKES NO OTHER EXPRESS OR IMPLIED WARRANTIES EITHER OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE.** Handling, storage and use of the product by Buyer or User are beyond the control of AgroFresh Inc. and Seller. Risks such as crop injury, ineffectiveness or other unintended consequences resulting from, but not limited to, weather or soil conditions, presence of other materials, disease, pests, drift to other crops or property, or failure to follow label directions will be assumed by the Buyer or User. **IN NO CASE WILL AgroFresh Inc. OR SELLER BE HELD LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE HANDLING, STORAGE OR USE OF THIS PRODUCT.**

GENERAL INFORMATION

SmartFresh™ is a unique postharvest tool for counteracting many of the undesirable effects of both internal (produced within the fruit) and external sources of ethylene on harvested fruit. By counteracting ethylene, SmartFresh™ provides many benefits to the fruit during transport and storage including:

- Maintaining firmness
- Maintaining titratable acidity
- Reducing internal ethylene production
- Protection from external sources of ethylene
- Reducing respiration
- Delaying ripening and senescence
- Reducing chilling injury

SmartFresh™ can be used immediately after harvest, prior to storage, prior to shipment or just prior to sale. SmartFresh™ is effective under both cool (below 55 °F, 13 °C) and warm (above 55°F, 13°C) temperature conditions. To realize maximum benefit in controlling senescence, fruits should be treated as soon as possible after harvest.

Harvested fruits must be exposed to the volatile active ingredient of SmartFresh™ in enclosed areas, such as storage rooms, greenhouses, coolers, shipping containers, enclosed truck trailers, or ambient temperature, refrigerated, or controlled atmosphere food storage facilities. This product is not intended for use outdoors or in other non-enclosed areas. These enclosed treatment areas should be gas tight as leakage will reduce SmartFresh™'s effectiveness.

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your state or tribe, consult the agency responsible for pesticide regulation. All applicable directions, restrictions, precautions and conditions of sale and warranty are to be followed. This labeling must be in the user's possession during application.

Fruit Storage Conditions

SmartFresh™ is compatible with and complementary to both controlled atmosphere and regular air fruit storage conditions. SmartFresh™ must be used in air tight storage areas.

Timing of Application

SmartFresh™ can be added to the storage area containing fruit immediately after harvest, upon entering storage, during distribution or in transit. After application, fruit not for immediate sale must be stored according to good standard commercial practices. It must be emphasized that maintaining the cold chain (keeping the fruit cool at all times) and strict adherence to phytosanitary practices remain essential in maintaining safe and high quality fruit.

Avocados: Apply SmartFresh™ to the fruit soon after harvest at the physiological maturity stage or just prior to the "turning black" stage.

Bananas: Apply SmartFresh™ after the bananas have been exposed to ethylene and prior to reaching color stage 4.

Melons: Apply SmartFresh™ as soon after harvest as possible.

Tomatoes: Apply SmartFresh™ between color stage mature green (Color Stage 1) and light red (Color Stage 5).

Application Method

Prior to application, ensure that the treatment area can be properly and promptly sealed following application. SmartFresh™ SmartTabs are used in conjunction with the SmartFresh™ Activator Kit. SmartFresh™ SmartTabs are **Green** tablets that, when mixed with **Blue** Activator Tablets in a proprietary Activator Solution, release the volatile active ingredient 1-methylcyclopropene (1-MCP). Make sure that you have a sufficient supply of both SmartFresh™ SmartTabs and SmartFresh™ Activator Kits available to treat your selected treatment area.

Step 1: Selection of the appropriate number of SmartTabs and SmartTab Activator Kits for use

a.) Accurately determine the volume of your EMPTY treatment area in cubic feet. Multiply inside dimensions: volume = length X width X height.

b.) Choose the correct number of Green SmartFresh™ SmartTabs from Table 1 below according to the size of the area and the crop to be treated.

Table 1. Number of Green SmartTabs Required

Volume of Treatment Area ft ³	Avocado Banana	Melon Tomato
706 to 882	2	3
883 to 1058	3	4
1059 to 1235	3	5
1236 to 1412	4	6
1413 to 1588	4	6
1589 to 1765	5	7
1766 to 1941	5	8
1942 to 2118	5	9
2119 to 2294	6	9
2295 to 2471	6	10
2472 to 2648	7	11
2649 to 2824	7	12
2825 to 3001	8	12
3002 to 3177	8	13
3178 to 3354	9	14
3355 to 3530	9	15
3531 to 3707	9	15
3708 to 3884	10	16
3885 to 4060	10	17
4061 to 4237	11	18
4238 to 4413	11	18
4414 to 4590	12	19
4591 to 4766	12	20
4767 to 4943	13	21
4944 to 5120	13	21
5121 to 5296	14	22

Never use more than ten (10) Green SmartFresh™ SmartTabs per activator kit. If more than ten (10) Green SmartFresh™ SmartTabs are needed, you must divide them among two (2) or more SmartFresh™ Activator Kits. Each Kit activates up to 10 SmartFresh™ SmartTabs only.

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Table 1. Number of Green SmartTabs Required
Continued

Volume of Treatment Area ft ³	Avocado Banana	Melon Tomato
5297 to 5473	14	23
5474 to 5649	14	24
5650 to 5826	15	24
5827 to 6002	15	25
6003 to 6179	16	26
6180 to 6356	16	27
6357 to 6532	17	27
6533 to 6709	17	28
6710 to 6885	18	29
6886 to 7062	18	30
7063 to 7239	18	30
7240 to 7415	19	31
7416 to 7592	19	32
7593 to 7768	20	33
7769 to 7945	20	33
7946 to 8121	21	34
8122 to 8298	21	35
8299 to 8475	22	36
8476 to 8651	22	37
8652 to 8828	23	37
8829 to 9004	23	38
9005 to 9181	23	39
9182 to 9357	24	39
9358 to 9534	24	40
9535 to 9711	25	41
9712 to 9887	25	42
9888 to 10064	26	42
10065 to 10240	26	43
10241 to 10417	27	44
10418 to 10593	27	45
10594 to 10770	27	45
10771 to 10947	28	46

Never use more than ten (10) Green SmartFresh™ SmartTabs per activator kit. If more than ten (10) Green SmartFresh™ SmartTabs are needed, you must divide them among two (2) or more SmartFresh™ Activator Kits. Each Kit activates up to 10 SmartFresh™ SmartTabs only.
Always use two (2) Blue tablets for EACH Release Kit.

Step 2. Evaluation Of The Quality Of The Treatment Room / Trailer / Container

To be used with SmartFresh™, rooms/containers/trailers must be gas tight and have an internal fan for mixing the atmosphere.

Check that:

- All Room/Trailer/Container drain holes are plugged
- There are no holes in the walls, ceiling, or floor
- All vents to outside air are closed
- When viewed from a dark interior, no outside light is visible
- Door seals are in EXCELLENT condition
 - No missing rubber No large cracks
 - No plastic slat doors No roller top doors
 - No side doors
- Scrubbers and/or ozone generators are off

Step 3: Fill the treatment room with the fruit to be treated

Step 4: Release of 1-MCP

- a) Remove the pack of two (2) Blue SmartFresh™ Activator Tablets from the foam block.
Always use both Blue tablets.
- b) Remove the appropriate number of Green SmartTabs from the SmartFresh™ SmartTabs Package.
- c) Peel off the foil seal from the SmartFresh™ Activator Solution taking care not to spill the solution.
- d) Add both the Blue and Green Tablets to the Activator Solution.
- e) Replace the cap.
- f) Place the small container on a level surface e.g. in the bottom gap of the pallet. Keep the container upright.
- g) Exit the treatment room immediately and promptly close the doors and ensure they are tightly sealed in order to contain the SmartFresh™ and ensure its maximum efficacy. The release of SmartFresh™ to the area will start several minutes after addition of the SmartTabs to the Activator Solution.
- h) Circulate air in the room for AT LEAST one (1) hour.
- i) Do not open the doors for AT LEAST twelve (12) hours.
- j) For CA Containers: do not change atmosphere for AT LEAST twelve (12) hours.

Step 5: Reentry To The Storage Area

At the end of the SmartFresh™ treatment period, vent the treated room by opening the doors for a minimum of thirty minutes with continued full internal ventilation before allowing workers to enter. At the end of the room venting, remove the SmartFresh™ Activator Solution and dispose of it as non-hazardous waste on-site or at an approved waste disposal facility. Treated fruit not intended for immediate sale should be stored according to standard commercial practices, in either refrigerated air or controlled atmosphere conditions.

Restrictions

Restricted Entry Period (REI): 30 minutes after room has been vented

Maximum season use rate: One application with appropriate number of tablets

Do not smoke during the SmartFresh™ application.

Do not treat fruit stressed from poor fertility, heat, drought or sunscald

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in original packaging in a cool, dry place.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse or equivalent. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

SmartFresh™ is a registered trademark of AgroFresh, Inc./Rohm and Haas Company

AgroFresh Inc.
A Fully-Owned Subsidiary of Rohm and Haas Company
100 Independence Mall West
Philadelphia, PA. 19106
(215) 592-3000

**OLD ACTIVE INGREDIENT
NEW PRODUCT REGISTRATION/EXISTING PRODUCT AMENDMENT
CHECKLIST**

EPA File Symbol/Reg. No. of product reviewed: 71297-3

Application Date: Initial 1/23/03, Re-submission: 10/02/04

RAL: Driss Benmhend

If amendment, indicate type: label, CSF or both: _____

If amendment, is change covered by PR Notice 98-10 (Notifications)? YES ___ NO ___

If Yes, STOP. Call applicant and inform them that this submission will be converted to a notification. After closing out PRATS, forward to NRC.

1. Application Form (EPA Form 8570-1) signed and complete YES ☒ NO ___

including package type

1a. Fast-Track: YES ___ NO ☒2. Final printed labeling received for labels approved after 10/1/99? YES ☒ NO ___ NA ___

If NO, Stop! E-mail applicant and request final printed labeling (FPL). Let them know that FPL from the last accepted label is needed to support the current application. File copy of your e-mail as record of notification. Log out of PRATS (label deficiency). Exceptions to this practice can occur.

3. Confidential Statement of Formula (EPA Form 8570-4)a) Completely filled out including pH, flashpoint, flammability, etc. if applicable YES ☒ NO ___b) Totals are accurate YES ☒ NO ___c) Certified limits agree with 40 CFR 158.175 or 5 batch analysis YES ☒ NO ___d) PC codes assigned on CSF for inerts and 40 CFR 180.1001 c, d, or e codes noted for products that have food or feed uses YES ☒ NO ___e) List 1 inert ingredient present? YES ☒ NO ___f) Alternate formula(s) do not require different labeling from basic or other alternate formulas? YES ___ NO ☒g) CSF is signed and dated YES ☒ NO ___h) Registered source for a.i. YES ☒ NO ___

Internal BBPD Guidance Document - Other Items May be Required

4. Data Matrix (EPA Form 8570-35) and Data

- a) Using selective method? YES ☒ NO ☐
If NO, data matrix not required,
skip to item 5.
- 1) Complete data matrix. Minimum data matrix for registration
would include product specific acute toxicology and product
chemistry data and efficacy for public health pests. Minor CSF
and labeling amendments may not require a data matrix. YES ☒ NO ☐
- b) Adequate product specific data YES ☒ NO ☐
- c) Registered source used for active ingredient. YES ☒ NO ☐
If YES, active ingredient is from a registered source
and generic data should be satisfied by registered
source, skip to item 4. If NO, generic data needed.
- 1) adequate generic data YES ☒ NO ☐
- d) Data passed 86-5 (Data Formatting PR Notice)? YES ☒ NO ☐
- e) Public copy of matrix present, as required by PR Notice 98-5
(Data Compensation)? YES ☒ NO ☐

5. Certification with Respect to Citation of Data

(EPA Form 8570-34) (See 40 CFR 152.80-98 and PR Notice 98-5)

If no data are required or submitted, Certification with Respect to
Citation of Data need not be submitted. This is often true for
minor amendments.

- a) Did applicant check a method of support? YES ☒ NO ☐
- b) General Offer to Pay checked for cite-all method
or cite-all option under selective method. YES ☐ NO ☐ N/A ☒
- c) Is the form signed and dated? YES ☒ NO ☐
- d) Check form and data matrix. Are exclusive use data cited
from other sources? YES ☐ NO ☒
- 1) If YES, is required authorization letter present? YES ☐ NO ☐

Internal BBPD Guidance Document - Other Items May be Required

6. Formulators Exemption Form (EPA Form 8570-27) filled out and signed if using a registered source active ingredient in the formulation. YES ___ NO ___ N/A ☒ ___

7. Exclusive Use Notice Requirement Prior to Registration (Required per 40 CFR 152.116, separate from permission of an exclusive use data submitter to rely on exclusive use data)

Is this an exclusive use active ingredient or combination of active ingredients (registered within last 10 years) ? YES ___ NO ☒ ___

If YES, go to a) or b) below.

a) Has a notification letter or email been sent to the exclusive use data submitter(s) at least 30 days before registration ? (This notification is required for all methods of data support except when the exclusive use data submitter(s)' product is used to formulate and the formulator's exemption is claimed.)

YES ___ NO ___

1) Has exclusive use data submitter requested during 30 day period the applicants' list of data requirements and method of compliance ?

YES ___ NO ___

OR:

b) Has registrant submitted certification from exclusive use data submitter that submitter is aware of application and does not object to the registration ?

YES ___ NO ___

8. Label(s) Date of Label Review: 2/25/04

a) Label(s) agree with current Label Review Manual and appropriate REDS YES ☒ NO ___

b) Acute toxicology, product chemistry, and efficacy data examined for labeling YES ☒ NO ___

c) Nominal concentration of a.i. listed in ingredients statement YES ☒ NO ___

d) Storage and disposal instructions agree with container types listed on application form YES ☒ NO ___

e) Unique Product Name for Same Company (Check REFS) YES ☒ NO ___

f) Labeling is acceptable. Corrections or changes are NOT necessary? YES ☒ NO ___

g) Bob Torla Concurrence for OMRI Logo: _____ N/A ☒ ___

Registration Details

Company: 71297 AGRO FRESH INC.

Risk Mgr: RM 90 Biologicals & Pollution Prevention Division, PM Team 90

Organization: BPPD / IO

Current Status: Under Review (17-Jan-2003)

Reg. Number: 71297-G

Pesticide Type: Biochemical

High Endangered?

Use Type: Unkno

Signal Word: X

Repack: Yes No

NPIC Phone: Yes No

WPS Written Notification: Yes No

Related Products

Use Patterns

Transfer History

Toxicology

Mode Of Action

FR Notice

Receipts

Product Name

Ingredient

Formulation Property

Pesticide Category

Permitted State

Product Name

Name Status

SMART FRESH SMART TABS

Active

MAR 03 2004

BPPD

WPS-PPE

Label Image

Container Info

Tracking

Status

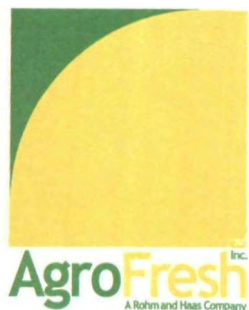
Sites/Pests

CSF

Data Requirements

Generate Rqmts

Inert Ingredients



February 25, 2004

Mr. Driss Benmhend
Office Of Pesticide Programs (7511C)
Biopesticides and Pollution Prevention Division
U.S. Environmental Protection Agency
Room 910, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202-4501

Dear Mr. Benmhend:

Re: SmartFresh™ SmartTabs
EPA File Symbol 71297-G
Active ingredient = 1-methylcyclopropene
October 9, 2003 Letter From Sheryl Reilly

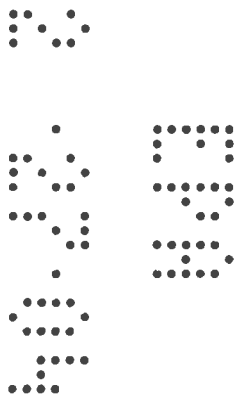
I am writing in response to the letter from Sheryl Reilly dated October 9, 2003. In that letter several deficiencies were identified with respect to the approval of the pending application to register SmartFresh™ SmartTabs. I have addressed each of the deficiencies below using the same numbering of items as contained in the October 9 letter.

1a. In subsequent discussions with the Agency, it was agreed that only a single colorant was not contained in the cleared inerts in 40 CFR 180.1001. This colorant has been replaced in the formulation with an inert that is cleared for food use in 40 CFR 180.1001. A revised Confidential Statement of Formula (CSF) is enclosed.

1b. In the enclosed, revised CSF, the CAS number for [REDACTED] has been changed to reflect Agency records and the spelling error has been corrected.

1c. Agreed

1d. AgroFresh Inc. agrees to submit the long term storage stability study upon completion.



1e. Agreed

2a. A request to bridge the data from SmartFresh Technology (71297-1) was submitted in a letter dated June 2, 2003. I am enclosing a copy.

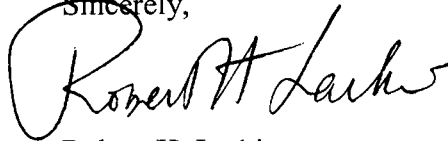
2b. Agreed

3. A request to bridge the data from SmartFresh Technology (71297-2) was submitted in a letter dated June 2, 2003. I am enclosing a copy.

I have also enclosed five copies of a revised label for SmartFresh™ SmartTabs which contains some minor revisions compared to the label contained in the original registration application submission of January 21, 2003. Please discard the original draft label and replace it with the enclosed draft.

With this information, I believe that you can successfully conclude your review and approve the registration of SmartFresh™ SmartTabs. I appreciate your efforts to get this unique technology to the marketplace. Please let me know if you have any questions or need any additional information.

Sincerely,



Robert H. Larkin

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10



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OCT 09 2003

Robert H. Larkin
AgroFresh, Inc.
100 Independence Mall West
Philadelphia, PA 19106

Subject: Application to Register SmartFresh™ SmartTabs Containing the Active
Ingredient 1-Methylcyclopropene
EPA File Symbol: 71297-G
Your Submission Received August 28, 2003

Dear Mr. Larkin:

All the supporting documents for the registration application for the product SmartFresh™ SmartTabs were reviewed, and a copy of the review summary is enclosed.

The Biopesticides and Pollution Prevention Division (BPPD) concluded that the data submitted is insufficient to support the subject application. The product chemistry studies are unacceptable due to the use in the product formulation of two inert ingredients that are not cleared by EPA for food use. Please refer to the enclosed review summary for further details and recommendations on how to upgrade these studies and your submission to an acceptable level. These deficiencies must be resolved before this application can be given further consideration.

Your application will be kept active for a period of 75 days to give you an opportunity to correct the listed deficiencies. If you find that you need more time to complete the requirements, you may request an extension and commit to satisfying the deficiencies within a reasonable stated period of time. If this procedure is not followed, the Agency may administratively withdraw your application from further consideration and retire this file without further notice to you in accordance with policy established by PR Notice 75-4 of August 27, 1975. After that, you will have to submit a completely new application should you wish to pursue the registration of your product after the application has been withdrawn.

If you have questions regarding this matter, contact Driss Benmhend at (703) 308-9525,
or via email at benmhend.driss@epa.gov.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sheryl K. Reilly".

Sheryl K. Reilly Ph. D., Chief
Biochemical Pesticides Branch
Biopesticides and Pollution
Prevention Division (7511C)

Enclosures

Explore Registrations					
Reg Number:	71297-G	Reg. Type:	Product Registration - Section 3	Status:	Under Review (17-Jan-2003)
Name:	SMART FRESH SMART TABS			<View Registration Details>	
(No New Receipts)					
S:	Submission Type	OPP Rec'd Date	Resubmission	Description	
<div style="display: flex;"> <div style="flex: 1;"> <p>...Decisions...</p> <ul style="list-style-type: none"> Data Requirements D: 331429; 71297-G;400;NO DATA REQUIRED; S: 744937 6/3/03; Miscellaneous Receipt; 7 D: 211756; 71297-G;165;NEW REGISTRATION; </div> <div style="flex: 2;"> <p>S: 744937 Reg #: 71297-G</p> <p>Submission Type: Miscellaneous Receipt</p> <p>Resubmission?: <input type="radio"/> Yes <input checked="" type="radio"/> No</p> <p>Decision #: 331429; 400;NO DATA REQUIRED;</p> <p>Submitter Company: AGRO FRESH INC.</p> <p>Application Date: 02-Jun-2003</p> <p>OPP Received Date: 03-Jun-2003 Date Sent to Risk manager: 28-Aug-2003</p> <p>Studies Included?: <input type="radio"/> Yes <input checked="" type="radio"/> No Fast Track?: <input type="radio"/> Yes <input checked="" type="radio"/> No</p> <p>Form A Signed? <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> None Date: <input type="text"/></p> <p>Form B Signed? <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> None Date: <input type="text"/></p> <p>Reviewer: Benmhend, Driss</p> <p>Received DT: 28-Aug-2003 Editable Due DT: <input type="text"/></p> <p>Admin Due DT: 03-Jun-2003 Response: 0, 28-Aug-2003</p> <p>Priority Weight: <input type="text"/> Priority Points: <input type="text"/></p> <p>Comments: <input type="text"/></p> </div> </div>					

AUG 28 2003 - add to OPPIN.
sdh

File & close OPPIN



June 2, 2003

Office Of Pesticide Programs (7511C)
Biocides and Pollution Prevention Division
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202-4501

Attention: Mr. Driss Benmhend

Dear Mr. Benmhend:

Re: SmartFresh™ SmartTabs
EPA File Symbol 71297-G
Active Ingredient = 1-Methylcyclopropene

4i
Request to Bridge Study
7/2/03 B.

On January 21, 2003, I submitted an application to register a new formulation of the active ingredient 1-methylcyclopropene (1-MCP). The brand name of the new formulation is SmartFresh™ SmartTabs. This new formulation is a tablet containing 0.63% of 1-MCP – a lower concentration of 1-MCP than is contained in the currently registered powder formulation, SmartFresh™ Technology, which contains 3.3% 1-MCP. Since the SmartFresh SmartTabs formulation is intended for the same use pattern as SmartFresh Technology, I request that all of the studies submitted in support of the SmartFresh Technology registration be used as bridging studies to support the registration of SmartFresh SmartTabs. A list of these studies, in Data Matrix format, with their associated MRID numbers was submitted on January 21, 2003 along with the other administrative materials to support the registration of SmartFresh SmartTabs. They are identified as "Previously Submitted Studies" on the Data Matrix forms.

Please let me know if you have any questions or need any further information.

Sincerely,

Robert H. Larkin, Ph.D.
Vice President,
Research and Regulatory Affairs

Data Screen Comment Form for Active Ingredient [Methylcyclopropene; PC No.]

Product Name [EPA Reg. No. 71297-G]

Date [04/23/2003]

RAL [D. Benmhend]

Screener [R. S. Jones]

Russell S. Jones 4/23/03

THIS FORM [CONTAINS/DOES NOT CONTAIN] CONFIDENTIAL BUSINESS INFORMATION

Product Chemistry

1. The CSF appears to be adequate.
2. Product chemistry submission appears to be complete

Toxicity

1. Submitted previously submitted and reviewed oral LD50 study.
2. No other tox studies/data/waivers submitted

Non-target Organisms

No studies/data/waivers submitted.

Applicant is signaling in the data matrix his intention for requesting waivers. We asked him to make an official request. DB

Product Performance (Efficacy)

Not required

Residue

Not required

Comments/Recommendations

1. Product chemistry data is adequate to be sent to contractor for review. Information contained in MRID458841-02 (Description of the Formulation and Activation Kit) may be summarized, but does not require a separate DER (can be appended to product chemistry DER).

X

2. Not necessary to re-review oral tox study - No DER needed from Contractor. However, registrant should formally request that all previously submitted Tier I tox & exposure studies/data used to support previously registered 1-MCP products, be bridged to support the new product.
3. Registrant should formally request that all previously submitted Tier I Non-target organism studies/data used to support previously registered 1-MCP products, be bridged to support the new product.

MAR 26 2003

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs

AGROFRESH, INC./ROHM AND HAAS COMPANY
100 INDEPENDENCE MALL WEST
PHILADELPHIA, PA 19106

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your transmittal of 01/17/03. Our staff has completed a preliminary analysis of the material. The results are provided as follows:


Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

Science Screening Package

RAL: Driss Benmhend

Date: April 9, 2003

Applicant: Agrofresh, Inc

EPA Reg.#: 71297- 

Active Ingredient: I-methylcyclopropene (1-MCP) (PC Code: 224459)

Remarks: This is a application for new product (with an old ai)
New formulation (tablets) for a usage already approved...

Attached Documents:-Cover letter
-Data matrix
-Label and CSF
-Product Chemistry (identity..) MRID # 458439-01
-Product Chemistry (Characteristics.. MRID # 458841-01
-Description of Composition MRID # 458841-02
-Acute Tox. Study MRID # 458439-02

Science Screening Package

RAL: Driss Benmhend

Date: April 9, 2003

Applicant: Agrofresh, Inc

EPA Reg.#: 71297-

Active Ingredient: I-methylcyclopropene (1-MCP) (PC Code: 224459)

Remarks: This is a application for new product (with an old ai)
New formulation (tablets) for a usage already approved...

Attached Documents:-Cover letter
-Data matrix
-Label and CSF
-Product Chemistry (identity..) MRID # 458439-01
-Product Chemistry (Characteristics.. MRID # 458841-01
-Description of Composition MRID # 458841-02
-Acute Tox. Study MRID # 458439-02

BPPD PRAT ACTION CODING FORM

Rev. 7/01 Janet Anderson

S. Reilly

REGISTRANT/COMPANY NAME:

AGRO FRESH

Fast Track: Yes ☐ No ☒

Reviewer DESS

Assigned by LH

EPA REG./FILE SYMBOL 71297-G

ACTION CODE 165

(Note: If Fast Track, you may need to change Reviewer's Name in PRAT.)

(New A.I./EUP'S/Tolerances: Yes ☐ No ☐)

DATE OF APPLICATION 1/16/03

EPA RECEIVED DATE 01/17/03

BPPD RECEIVED DATE 3/08/03

SUBMISSION BARCODE 5632726

1-MCP
** Send to Science Screen*

ASSIGNED IN PRAT: Yes ☒ No ☐

COMPLETED BY T. Bethea DATE 4/1/03

LOGGED IN BRATS: Yes ☒ No ☐ DATE 4/8/03 COMPLETED BY T. Bethea

RAL RECEIVED D. Bentland DATE 4/7/03

(RAL initials)

FINAL ACTION

RESPONSE CODE: _____

RESPONSE DATE: _____

MOS: _____ (1) Cite All
_____ (4) Not Applicable
_____ (3) Selective

CRP	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Restricted Use:	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Manufacturing Use:	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Exclusive Use:	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Administrative

Materials

Resubmission

JAN 30 2003

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs

AGROFRESH, INC./ROHM AND HAAS COMPANY
100 INDEPENDENCE MALL WEST
PHILADELPHIA, PA 19106

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your transmittal of 01/21/03. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your data submittal was found to be partially in compliance with the standards for submission of data contained in PR Notice 86-5, with the exceptions noted below. A copy of your transmittal bibliography is enclosed, annotated with the Master Record ID's (MRIDs) assigned to each document accepted. Please use these numbers in all future references to these documents. If deficiencies were found which apply to individual accepted studies, they are listed below following the applicable MRID. Any document which has been assigned a MRID has been accepted under PR Notice 86-5. If any comments related to a MRID appear on this report, they are provided for your information and reference when preparing future submissions. Some individual documents were not acceptable, and all copies are being returned to you for correction for the reasons indicated below. These rejected studies have been assigned separate identification numbers which are annotated on both the enclosed bibliography and the rejected document labels. The rejected studies and their deficiencies are described below.

Rejected study [02] :

You must include one of the two acceptable statements of data confidentiality claims under FIFRA section 10(d)(1)(A), (B), or (C) as the second element in each study. The language of two alternative forms of the Statement of Data Confidentiality Claims, shown in Attachment 3 of PR Notice 86-5, cannot be altered. See pages 8 and 13 of the Notice.

Rejected study [03] :

You must include one of the two acceptable statements of data confidentiality claims under FIFRA section 10(d)(1)(A), (B), or (C) as the second element in each

study. The language of two alternative forms of the Statement of Data Confidentiality Claims, shown in Attachment 3 of PR Notice 86-5, cannot be altered. See pages 8 and 13 of the Notice.

This is an **ACCEPTED** submission

90

This is a **PARTIALLY ACCEPTED/COMPLETELY REJECTED** submission

January 21, 2003

Agro

A Rohm and Haas Company

Document Processing Desk (APPL)
Office Of Pesticide Programs (7504C)
US Environmental Protection Agency
Biopesticides and Pollution Prevention Division
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202-4501

71297-G

Attention: Mr. Driss Benmhend:

Subjects: Application For Section 3 Registration
SmartFresh™ SmartTabs (EPA Registration No. 71297-)
Active Ingredient = 1-Methylcyclopropene

AgroFresh Inc., a fully-owned subsidiary of Rohm and Haas Company, submits an application for a Section 3 registration for the product SmartFresh™ SmartTabs, a tablet formulation containing 0.63% of the active ingredient 1-methylcyclopropene (1-MCP), for indoor use on bananas, tomatoes, melons and avocados. 1-MCP has been classified by EPA as a plant growth regulator structurally similar to ethylene and other naturally occurring plant materials and is regulated by the Biopesticides and Pollution Prevention Division. EPA has previously established an exemption from tolerance for 1-MCP.

This new formulation of 1-MCP will be marketed in a ten pack of tablets that are used in conjunction with a disposable application kit. The product is designed for the treatment of smaller rooms of fruit in contrast to the powder formulation of 1-MCP (SmartFresh™ Technology, EPA Registration No. 71297-2) which is designed for the treatment of large storage rooms. As is the case with SmartFresh Technology, this product has been designed to minimize any exposure to workers applying the product.

The Signal Word proposed for SmartFresh™ SmartTabs is CAUTION based on the results of acute toxicity testing submitted with this application and the results demonstrated with similar formulations of 1-MCP. A proposed label is included with this application as well as the required product specific studies (see Attachment). Administrative materials submitted with this letter are as follows:

- 1) EPA Form 8570-1: Application for Pesticide Registration
- 2) EPA Form 8570-34: Certification With Respect To Citation Of Data
- 3) Proposed Label for SmartFresh SmartTabs (5 copies)
- 4) Confidential Statement Of Formula for SmartFresh SmartTabs
- 5) Data Matrix for Previously Submitted Studies
- 6) Data Matrix for New Studies

Please assign MRID numbers to the enclosed studies. You may contact me by telephone (215-641-7397), fax (215-619-1629) or e-mail (rlarkin@agrofresh.com) if you have any questions or need additional information.

Sincerely,



Robert H. Larkin
Vice President, Research & Regulatory Affairs

Enclosures (reports in triplicate):

Guideline Reference Number	AgroFresh Inc. Report No.	Report Title	MRID
Series 830 Group A	AF02-054	Product Chemistry Series 830 Group A: Product Identity, Composition and Analysis of SmartFresh™ Tablet Formulation	45843901
Series 830 Group B	AF02-059	Product Chemistry Series 830 Group B: Physical and Chemical Characteristics of SmartFresh™ Tablet Formulation	45884101
None	AF02-089	Description and Composition of the SmartFresh™ SmarTabs Formulation and Activator Kit	45884102
OPPTS 870.1100	02RC-010	Acute Oral Toxicity/LD 50 in Rats	45843902



Russell Jones

10/22/03 12:17 PM

To: Robert H Larkin <RLarkin@agrofresh.com>
cc: Driss Benmhend/DC/USEPA/US@EPA
Subject: Re: Response To Letter Dated October 9, 2003

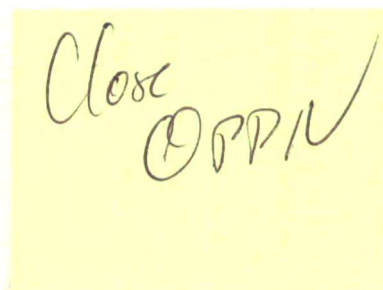
Dr. Larkin:

Unfortunately, EPA is constrained by regulations and can offer you only two options regarding the inert ingredient [REDACTED]. Either replace it with another comparable substance already cleared under 40 CFR 180.1001 c or d (most rapid option); or apply to the Registration Division to have this inert cleared for food use under 40 CFR 180.1001 c and/or d. You should note that RD will take not less than a year to provide clearance.

Another option would be to provide quantitative data demonstrating unequivocally that [REDACTED] does not volatilize and/or does not exit the application device such that it leaves residues on the treated food commodity.

Russ Jones

Russell S. Jones, Ph.D., Biologist
Biopesticides & Pollution Prevention Division
U. S. Environmental Protection Agency
Ariel Rios Bldg. (7511C)
1200 Pennsylvania Avenue
Washington, DC 20460
Ph: 703/308-5071
jones.russell@epa.gov



Robert H Larkin <RLarkin@agrofresh.com>



Robert H Larkin
<RLarkin@agrofresh.com>

10/20/03 01:48 PM

To: Driss Benmhend/DC/USEPA/US@EPA
cc: Russell Jones/DC/USEPA/US@EPA
Subject: Response To Letter Dated October 9, 2003

Driss, thanks for faxing me the letter from Sheryl along with the review from Russ. It looks like the only issue to be resolved is the presence of the two dyes that are present as inerts in the tablet formulation. See my comments below.

1. [REDACTED]

The common name for this dye is [REDACTED]. [REDACTED] is cleared for food use under 40 CFR 180.1001. I apologize for not including the common name in the CSF.

2. [REDACTED]

This was an oversight on our part. Not realizing the regulatory consequences, the chemist who was developing the formulation chose [REDACTED] over [REDACTED]

[REDACTED] (cleared for food use under 40 CFR 180.1001) because of the better color stability properties of [REDACTED]. Since we have completed all of our formulation and pilot plant work with [REDACTED] I would like to maintain the submitted formulation. The following arguments support the use of [REDACTED]

i.) To use the tablet formulation, the tablets, along with two tablets of [REDACTED] 1-MCP out of the small hole in the container and into the storage room. The two dyes, along with the other inert ingredients in the formulation, remain in the container and do not come into contact with the treated food. Therefore, the [REDACTED] dye does not require a tolerance or an exemption from tolerance.

ii.) Although [REDACTED] does not appear as a cleared food use inert in 40 CFR 180.1001, it is approved by FDA for use in foods [REDACTED] and ingested drugs [REDACTED] "...generally in amounts consistent with current good manufacturing practice...". Therefore, there will be no additional health or safety issue associated with the use of this dye in our formulation.

Based on these arguments, could you reconsider the need to replace [REDACTED] in the formulation? Thanks for your help.



Robert H Larkin
<RLarkin@agrofresh.com>

10/22/03 11:33 AM

To: Driss Benmhend/DC/USEPA/US@EPA
cc:
Subject: Application For Manufacturing Use Product

Driss, just wanted to let you know that I am sending today by FedEx the application for registration for the manufacturing use product for 1-MCP that we discussed by telephone. I have attached a copy of the transmittal letter. Since there are no scientific studies for review, I assume that this registration can be approved relatively quickly. For planning purposes, can I assume that approval will occur in 60 to 90 days?

On a different subject, has Russ had a chance to review the response on the two dyes contained in SmartFresh SmarTabs that I sent on Monday? I am waiting to make a formal written response for feedback from Russ on the acceptability of the arguments I made for the retention of the two dyes in the formulation. (See attached file: TransmittalLetterMUP.doc)



TransmittalLetterMUP.d



Robert H Larkin
<RLarkin@agrofresh.com>

10/22/03 02:03 PM

To: Russell Jones/DC/USEPA/US@EPA
cc: Driss Benmhend/DC/USEPA/US@EPA
Subject: Re: Response To Letter Dated October 9, 2003

Russ, thanks for the quick response. I understand the constraints and the options you have outlined. Unfortunately, all of them would take some finite time including the work to replace the [REDACTED] with, for example [REDACTED] which is on the cleared inert list. Would it be possible to approve a temporary registration for the current CSF for a limited time, e.g. two years, to give us time to complete the work to change the formulation to contain [REDACTED] and to sell the tablets that we have made in our pilot plant production?

Jones.Russell@epamail.epa.gov
<RLarkin@agrofresh.com>

benmhend.driss@epamail.epa.gov
10/22/2003 12:17 PM
Letter Dated October 9, 2003

To: Robert H Larkin
cc:
bcc:
Subject: Re: Response To

Dr. Larkin:

Unfortunately, EPA is constrained by regulations and can offer you only two options regarding the inert ingredient [REDACTED]. Either replace it with another comparable substance already cleared under 40 CFR 180.1001 c or d (most rapid option); or apply to the Registration Division to have this inert cleared for food use under 40 CFR 180.1001 c and/or d. You should note that RD will take not less than a year to provide clearance.

Another option would be to provide quantitative data demonstrating unequivocally that [REDACTED] does not volatilize and/or does not exit the application device such that it leaves residues on the treated food commodity.

Russ Jones

Russell S. Jones, Ph.D., Biologist
Biopesticides & Pollution Prevention Division
U. S. Environmental Protection Agency
Ariel Rios Bldg. (7511C)
1200 Pennsylvania Avenue
Washington, DC 20460

Ph: 703/308-5071
jones.russell@epa.gov

Robert H Larkin

<RLarkin@agrofres
Benmhend/DC/USEPA/US@EPA
h.com>

To: Driss

cc: Russell

Jones/DC/USEPA/US@EPA

Subject: Response To Letter

Dated October 9, 2003

10/20/03 01:48 PM

Driss, thanks for faxing me the letter from Sheryl along with the review from Russ. It looks like the only issue to be resolved is the presence of the two dyes that are present as inerts in the tablet formulation. See my comments below.

1. [REDACTED]

The common name for this dye is [REDACTED] [REDACTED] is cleared for food use under 40 CFR 180.1001. I apologize for not including the common name in the CSF.

2. [REDACTED]

This was an oversight on our part. Not realizing the regulatory consequences, the chemist who was developing the formulation chose [REDACTED] over [REDACTED] (cleared for food use under 40 CFR 180.1001) because of the better color stability properties of [REDACTED]. Since we have completed all of our formulation and pilot plant work with [REDACTED] I would like to maintain the submitted formulation. The following arguments support the use of [REDACTED]

i.) To use the tablet formulation, the tablets, along with two tablets of [REDACTED]

[REDACTED] 1-MCP out of the small hole in the container and into the storage room. The two dyes, along with the other inert

Commercial/financial information may be entitled to confidential treatment

ingredients in the formulation, remain in the container and do not come into contact with the treated food. Therefore, the [REDACTED] dye does not require a tolerance or an exemption from tolerance.

ii.) Although [REDACTED] does not appear as a cleared food use inert in 40 CFR 180.1001, it is approved by FDA for use in foods [REDACTED] and ingested drugs [REDACTED] "...generally in amounts consistent with current good manufacturing practice...". Therefore, there will be no additional health or safety issue associated with the use of this dye in our formulation.

Based on these arguments, could you reconsider the need to replace [REDACTED] in the formulation? Thanks for your help.

January 21, 2003

Agro

A Rohm and Haas Company

Document Processing Desk (APPL)
Office Of Pesticide Programs (7504C)
US Environmental Protection Agency
Biopesticides and Pollution Prevention Division
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202-4501

71297-G

Attention: Mr. Driss Benmhend:

Subjects: Application For Section 3 Registration
SmartFresh™ SmartTabs (EPA Registration No. 71297-)
Active Ingredient = 1-Methylcyclopropene

AgroFresh Inc., a fully-owned subsidiary of Rohm and Haas Company, submits an application for a Section 3 registration for the product SmartFresh™ SmartTabs, a tablet formulation containing 0.63% of the active ingredient 1-methylcyclopropene (1-MCP), for indoor use on bananas, tomatoes, melons and avocados. 1-MCP has been classified by EPA as a plant growth regulator structurally similar to ethylene and other naturally occurring plant materials and is regulated by the Biopesticides and Pollution Prevention Division. EPA has previously established an exemption from tolerance for 1-MCP.

This new formulation of 1-MCP will be marketed in a ten pack of tablets that are used in conjunction with a disposable application kit. The product is designed for the treatment of smaller rooms of fruit in contrast to the powder formulation of 1-MCP (SmartFresh™ Technology, EPA Registration No. 71297-2) which is designed for the treatment of large storage rooms. As is the case with SmartFresh Technology, this product has been designed to minimize any exposure to workers applying the product.

The Signal Word proposed for SmartFresh™ SmartTabs is CAUTION based on the results of acute toxicity testing submitted with this application and the results demonstrated with similar formulations of 1-MCP. A proposed label is included with this application as well as the required product specific studies (see Attachment). Administrative materials submitted with this letter are as follows:

- 1) EPA Form 8570-1: Application for Pesticide Registration
- 2) EPA Form 8570-34: Certification With Respect To Citation Of Data
- 3) Proposed Label for SmartFresh SmartTabs (5 copies)
- 4) Confidential Statement Of Formula for SmartFresh SmartTabs
- 5) Data Matrix for Previously Submitted Studies
- 6) Data Matrix for New Studies

Please assign MRID numbers to the enclosed studies. You may contact me by telephone (215-641-7397), fax (215-619-1629) or e-mail (rlarkin@agrofresh.com) if you have any questions or need additional information.

Sincerely,



Robert H. Larkin
Vice President, Research & Regulatory Affairs

Enclosures (reports in triplicate):

Guideline Reference Number	AgroFresh Inc. Report No.	Report Title	MRID
Series 830 Group A	AF02-054	Product Chemistry Series 830 Group A: Product Identity, Composition and Analysis of SmartFresh™ Tablet Formulation	45843901
Series 830 Group B	AF02-059	Product Chemistry Series 830 Group B: Physical and Chemical Characteristics of SmartFresh™ Tablet Formulation	45884101
None	AF02-089	Description and Composition of the SmartFresh™ SmarTabs Formulation and Activator Kit	45884102
OPPTS 870.1100	02RC-010	Acute Oral Toxicity/LD 50 in Rats	45843902

Russ:

6/13

you are the secondary/
science screen

for this ... RAC is

Driss.

Thanks,
Rosemary

BPPD WORK ASSIGNMENT #03-13

ORNL IAG #89939652-01

Date: 4/29/03

Date Mailed: 4/29/03

1. Oak Ridge National Laboratory (ORNL) shall independently review the studies identified below and prepare for each study a Data Evaluation Record (DER). In addition to its scientific expertise, the ORNL shall use the appropriate OPP Test Guidelines, science policy documents, and other guidelines and materials provided to ORNL for the purpose of training, orientation and guidance concerning the preparation of DERs under the IAG.

2. For technical/scientific questions that cannot be resolved by the ORNL without input from BPPD science staff, the ORNL shall contact: Roger Gardner, 703-308-8268. MRIDs and Studies for this work assignment are respectfully as follows:

EPA Reg No. 071297-G. Product Name: SmartFresh SmartTabs. Company: AgroFresh Inc.

Table 1.

DP Barcode	MRID #	Study Type	Est. hours
D289720/0712971-G	458439-01	Product Chemistry	4
D289720/0712971-G	458439-02	Acute Toxicity <i>as per form - no DER needed</i>	4
D289720/0712971-G	458841-01	Physical and Chem. Characteristics	4
D289720/0712971-G	458841-02	Description of Composition	4
Total Est. Hours			16

3. Transmittal dates for the First Draft of the DERs to BPPD shall conform generally to the "Working Days" specified in ORNL Proposal #1824-S511-A1. The Work Assignment Manager will review the proposed Transmittal and Due Dates and negotiate a mutually acceptable schedule for EPA and ORNL for delivering the first draft of the DERs. For research reports that do not include estimated hours, please notify the Work Assignment Manager with any questions or hour estimates.

4. The ORNL shall conduct its routing Quality Assurance/Quality Control reviews as specified in it QA/QC plan for the IAG.

6. EPA Secondary Reviewer for this product is Russell Jones, 703-308-5071 or email jones.russell@epa.gov.

for *Therese L. Bouson*
Rosemary E. Biancardi

4/29/03
Date

SmartFresh™ SmartTabs	AgroFresh Inc. A subsidiary of Rohm and Haas Company Philadelphia, PA. 19106 Tel: (215) 592-3000
----------------------------------	---

Active Ingredient: 1-Methylcyclopropene 0.63%

Other Ingredients: 99.37%

Total: 100.0%

EPA REGISTRATION NO. 71297-xx

EPA EST. NO. 71297-PA-003

NOTICE: Before using this product, read the entire Precautionary Statements, Conditions of Sale and Warranty, Directions for Use, Use Restrictions and Storage and Disposal Instructions. If the Conditions of Sale and Warranty are not acceptable, return the product and its generating system unopened and unused within thirty days of purchase to the place of purchase.

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

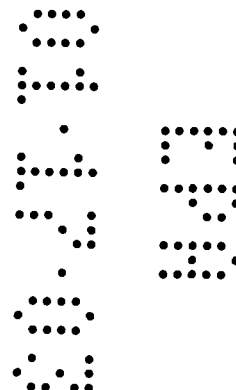
IF IN EYES: Flush with plenty of water for at least 15 minutes. Call a physician if irritation persists.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention.

IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

IF SWALLOWED: Dilute by drinking 1 or 2 glasses of water and call a physician.

Net Contents: 10 tablets (12.5 g)



PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Causes slight eye irritation. Harmful if absorbed through skin. Avoid contact with eyes. Avoid breathing vapor. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators of this product must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Safety glasses or goggles

Applicators and handlers must follow manufacturer's instructions for cleaning / maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

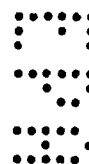
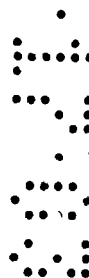
AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Workers Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas prior to venting the volatile active ingredient from the treatment room.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, prior to venting the volatile active ingredient from the treatment room is:

- Coveralls
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Respirator



CONDITIONS OF SALE AND WARRANTY

AgroFresh Inc. warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label only when used in accordance with label directions under normal conditions of use. AgroFresh Inc. **MAKES NO OTHER EXPRESS OR IMPLIED WARRANTIES EITHER OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE.** Handling, storage and use of the product by Buyer or User are beyond the control of AgroFresh Inc. and Seller. Risks such as crop injury, ineffectiveness or other unintended consequences resulting from, but not limited to, weather or soil conditions, presence of other materials, disease, pests, drift to other crops or property, or failure to follow label directions will be assumed by the Buyer or User. **IN NO CASE WILL AgroFresh Inc. OR SELLER BE HELD LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE HANDLING, STORAGE OR USE OF THIS PRODUCT.**

GENERAL INFORMATION

SmartFresh™ is a unique postharvest tool for counteracting many of the undesirable effects of both internal (produced within the fruit) and external sources of ethylene on harvested fruit. By counteracting ethylene, SmartFresh™ provides many benefits to the fruit during transport and storage including:

- Maintaining firmness
- Maintaining titratable acidity
- Reducing internal ethylene production
- Protection from external sources of ethylene
- Reducing respiration
- Delaying ripening and senescence
- Reducing chilling injury

SmartFresh™ can be used immediately after harvest, prior to storage, prior to shipment or just prior to sale. SmartFresh™ is effective under both cool (below 55 °F, 13 °C) and warm (above 55°F, 13°C) temperature conditions. To realize maximum benefit in controlling senescence, fruits should be treated as soon as possible after harvest.

Harvested fruits must be exposed to the volatile active ingredient of SmartFresh™ in enclosed areas, such as storage rooms, greenhouses, coolers, shipping containers, enclosed truck trailers, or ambient temperature, refrigerated, or controlled atmosphere food storage facilities. This product is not intended for use outdoors or in other non-enclosed areas. These enclosed treatment areas should be gas tight as leakage will reduce SmartFresh™'s effectiveness.

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your state or tribe, consult the agency responsible for pesticide regulation. All applicable directions, restrictions, precautions and conditions of sale and warranty are to be followed. This labeling must be in the user's possession during application.

Fruit Storage Conditions

SmartFresh™ is compatible with and complementary to both controlled atmosphere and regular air fruit storage conditions. SmartFresh™ must be used in air tight storage areas.

Timing of Application

SmartFresh™ can be added to the storage area containing fruit immediately after harvest, upon entering storage, during distribution or in transit. After application, fruit not for immediate sale must be stored according to good standard commercial practices. It must be emphasized that maintaining the cold chain (keeping the fruit cool at all times) and strict adherence to phytosanitary practices remain essential in maintaining safe and high quality fruit.

Avocadoes: Apply SmartFresh™ to the fruit soon after harvest at the physiological maturity stage or just prior to the "turning black" stage.

Bananas: Apply SmartFresh™ after the bananas have been exposed to ethylene and prior to reaching color stage 4.

Melons: Apply SmartFresh™ as soon after harvest as possible.

Tomatoes: Apply SmartFresh™ between color stage mature green (Color Stage 1) and light red (Color Stage 5).

Application Method

Prior to application, ensure that the treatment area can be properly and promptly sealed following application. SmartFresh™ SmartTabs are used in conjunction with the SmartFresh™ Activator Kit. SmartFresh™ SmartTabs are **Green** tablets that, when mixed with **Blue** Activator Tablets in a proprietary Activator Solution, release the volatile active ingredient 1-methylcyclopropene (1-MCP). Make sure that you have a sufficient supply of both SmartFresh™ SmartTabs and SmartFresh™ Activator Kits available to treat your selected treatment area.

Step 1: Selection of the appropriate number of SmartTabs and SmartTab Activator Kits for use

a.) Accurately determine the volume of your EMPTY treatment area in cubic feet. Multiply inside dimensions: volume = length X width X height.

b.) Choose the correct number of Green SmartFresh™ SmartTabs from Table 1 below according to the size of the area and the crop to be treated.

Table 1. Number of Green SmartTabs Required

Volume of Treatment Area ft ³	Avocado Banana	Melon Tomato
706 to 882	2	3
883 to 1058	3	4
1059 to 1235	3	5
1236 to 1412	4	6
1413 to 1588	4	6
1589 to 1765	5	7
1766 to 1941	5	8
1942 to 2118	5	9
2119 to 2294	6	9
2295 to 2471	6	10
2472 to 2648	7	11
2649 to 2824	7	12
2825 to 3001	8	12
3002 to 3177	8	13
3178 to 3354	9	14
3355 to 3530	9	15
3531 to 3707	9	15
3708 to 3884	10	16
3885 to 4060	10	17
4061 to 4237	11	18
4238 to 4413	11	18
4414 to 4590	12	19
4591 to 4766	12	20
4767 to 4943	13	21
4944 to 5120	13	21
5121 to 5296	14	22

Never use more than ten (10) Green SmartFresh™ SmartTabs per activator kit. If more than ten (10) Green SmartFresh™ SmartTabs are needed, you must divide them among two (2) or more SmartFresh™ Activator Kits. Each Kit activates up to 10 SmartFresh™ SmartTabs only.

Always use two (2) Blue tablets for EACH Release Kit.

Table 1. Number of Green SmartTabs Required
Continued

Volume of Treatment Area ft ³	Avocado Banana	Melon Tomato
5297 to 5473	14	23
5474 to 5649	14	24
5650 to 5826	15	24
5827 to 6002	15	25
6003 to 6179	16	26
6180 to 6356	16	27
6357 to 6532	17	27
6533 to 6709	17	28
6710 to 6885	18	29
6886 to 7062	18	30
7063 to 7239	18	30
7240 to 7415	19	31
7416 to 7592	19	32
7593 to 7768	20	33
7769 to 7945	20	33
7946 to 8121	21	34
8122 to 8298	21	35
8299 to 8475	22	36
8476 to 8651	22	37
8652 to 8828	23	37
8829 to 9004	23	38
9005 to 9181	23	39
9182 to 9357	24	39
9358 to 9534	24	40
9535 to 9711	25	41
9712 to 9887	25	42
9888 to 10064	26	42
10065 to 10240	26	43
10241 to 10417	27	44
10418 to 10593	27	45
10594 to 10770	27	45
10771 to 10947	28	46

Never use more than ten (10) Green SmartFresh™ SmartTabs per activator kit. If more than ten (10) Green SmartFresh™ SmartTabs are needed, you must divide them among two (2) or more SmartFresh™ Activator Kits. Each Kit activates up to 10 SmartFresh™ SmartTabs only.
Always use two (2) Blue tablets for EACH Release Kit.

Step 2. Evaluation Of The Quality Of The Treatment Room / Trailer / Container

To be used with SmartFresh™, rooms/containers/trailers must be gas tight and have an internal fan for mixing the atmosphere.

Check that:

- All Room/Trailer/Container drain holes are plugged
- There are no holes in the walls, ceiling, or floor
- All vents to outside air are closed
- When viewed from a dark interior, no outside light is visible
- Door seals are in EXCELLENT condition
 - No missing rubber No large cracks
 - No plastic slat doors No roller top doors
 - No side doors
- Scrubbers and/or ozone generators are off

Step 3: Fill the treatment room with the fruit to be treated

Step 4: Release of 1-MCP

- a) Remove the pack of two (2) Blue SmartFresh™ Activator Tablets from the foam block.
Always use both Blue tablets.
- b) Remove the appropriate number of Green SmartTabs from the SmartFresh™ SmartTabs Package.
- c) Peel off the foil seal from the SmartFresh™ Activator Solution taking care not to spill the solution.
- d) Add both the **Blue** and **Green** Tablets to the Activator Solution.
- e) Replace the cap.
- f) Place the small container on a level surface e.g. in the bottom gap of the pallet. Keep the container upright.
- g) Exit the treatment room immediately and promptly close the doors and ensure they are tightly sealed in order to contain the SmartFresh™ and ensure its maximum efficacy. The release of SmartFresh™ to the area will start several minutes after addition of the SmartTabs to the Activator Solution.
- h) Circulate air in the room for AT LEAST one (1) hour.
- i) Do not open the doors for AT LEAST twelve (12) hours.
- j) For CA Containers: do not change atmosphere for AT LEAST twelve (12) hours.

Step 5: Reentry To The Storage Area

At the end of the SmartFresh™ treatment period, vent the treated room by opening the doors for a minimum of thirty minutes with continued full internal ventilation before allowing workers to enter. At the end of the room venting, remove the SmartFresh™ Activator Solution and dispose of it as non-hazardous waste on-site or at an approved waste disposal facility. Treated fruit not intended for immediate sale should be stored according to standard commercial practices, in either refrigerated air or controlled atmosphere conditions.

Restrictions

Restricted Entry Period (REI): 30 minutes after room has been vented

Maximum season use rate: One application with appropriate number of tablets

Do not smoke during the SmartFresh™ application.

Do not treat fruit stressed from poor fertility, heat, drought or sunscald

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in original packaging in a cool, dry place.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility

SmartFresh™ is a registered trademark of AgroFresh, Inc./Rohm and Haas Company

AgroFresh Inc.
A Fully-Owned Subsidiary of Rohm and Haas Company
100 Independence Mall West
Philadelphia, PA. 19106
(215) 592-3000

PREVIOUSLY SUBMITTED STUDY(IES)

MRID NUMBER

45843901

45843902

DATE

Data Screen Comment Form for Active Ingredient [Methylcyclopropene; PC No.]

Product Name [EPA Reg. No. 71297-G]

Date [04/23/2003]

RAL [D. Benmhend]

Screener [R. S. Jones]

Russell S. Jones 4/23/03

THIS FORM [CONTAINS/DOES NOT CONTAIN] CONFIDENTIAL BUSINESS INFORMATION

Product Chemistry

1. The CSF appears to be adequate.
2. Product chemistry submission appears to be complete

Toxicity

1. Submitted previously submitted and reviewed oral LD50 study.
2. No other tox studies/data/waivers submitted

Non-target Organisms

No studies/data/waivers submitted.

Applicant is signing in the data matrix his intention for requesting waivers. We asked him to make an official request. DB

Product Performance (Efficacy)

Not required

Residue

Not required

Comments/Recommendations

1. Product chemistry data is adequate to be sent to contractor for review. Information contained in MRID458841-02 (Description of the Formulation and Activation Kit) may be summarized, but does not require a separate DER (can be appended to product chemistry DER).

X

2. Not necessary to re-review oral tox study - No DER needed from Contractor. However, registrant should formally request that all previously submitted Tier I tox & exposure studies/data used to support previously registered 1-MCP products, be bridged to support the new product.
3. Registrant should formally request that all previously submitted Tier I Non-target organism studies/data used to support previously registered 1-MCP products, be bridged to support the new product.

Date: 1-24-03

File Number: 71297-G

☐ **No Data - File Room Make Ready for** _____
(PM or Individual)

☒ **Data - File Room Assign Jacket to Shelf**

☐ **Rejected - File Room Assign Jacket to Rejected Shelf**

DATE: 1/23/03

P.M. 92

EPA COMPANY NUMBER 71297-G

EPA REGISTRATION NUMBER
STATUS (For Amendments)

Active _____ Cancelled _____

Not in REFS _____

"Mc-Too" CITED PRODUCT STATUS

Active _____ Cancelled _____

Not in REFS _____

PRAT RECORD CREATED 1/23/03



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

January 23, 2003

OFFICE OF PESTIDE
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

ROBERT H. LARKIN
AGRO FRESH INC.
100 INDEPENDENCE MALL WEST
PHILADELPHIA, PA 19105

PRODUCT NAME: SMART FRESH SMART TABS
COMPANY NAME: AGRO FRESH INC.
OPP IDENTIFICATION NUMBER: 299970
EPA FILE SYMBOL: 71297-G
EPA RECEIPT DATE: 01/21/03

SUBJECT: RECEIPT OF APPLICATION FOR A NEW REGISTRATION

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for a new registration and it has passed an administrative screen for completeness.

Please note that this is only a notification of receipt of your application. This is only the first step in the application process and does NOT constitute approval.

If you have any questions, please contact Biologicals & Pollution Prevention Division, PM Team 92, at (703) 308-8260.

Sincerely,

A handwritten signature in cursive script, reading "Patricia K. Thooke".

Front End Processing Staff
Information Services Branch
Information Resources and Services Division

N/FT
B
Agro

A Rohm and Haas Company

January 21, 2003

Document Processing Desk (APPL)
Office Of Pesticide Programs (7504C)
US Environmental Protection Agency
Biopesticides and Pollution Prevention Division
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202-4501

Attention: Mr. Driss Benmhend:

Subjects: Application For Section 3 Registration
SmartFresh™ SmartTabs (EPA Registration No. 71297-)
Active Ingredient = 1-Methylcyclopropene

AgroFresh Inc., a fully-owned subsidiary of Rohm and Haas Company, submits an application for a Section 3 registration for the product SmartFresh™ SmartTabs, a tablet formulation containing 0.63% of the active ingredient 1-methylcyclopropene (1-MCP), for indoor use on bananas, tomatoes, melons and avocados. 1-MCP has been classified by EPA as a plant growth regulator structurally similar to ethylene and other naturally occurring plant materials and is regulated by the Biopesticides and Pollution Prevention Division. EPA has previously established an exemption from tolerance for 1-MCP.

This new formulation of 1-MCP will be marketed in a ten pack of tablets that are used in conjunction with a disposable application kit. The product is designed for the treatment of smaller rooms of fruit in contrast to the powder formulation of 1-MCP (SmartFresh™ Technology, EPA Registration No. 71297-2) which is designed for the treatment of large storage rooms. As is the case with SmartFresh Technology, this product has been designed to minimize any exposure to workers applying the product.

The Signal Word proposed for SmartFresh™ SmartTabs is CAUTION based on the results of acute toxicity testing submitted with this application and the results demonstrated with similar formulations of 1-MCP. A proposed label is included with this application as well as the required product specific studies (see Attachment). Administrative materials submitted with this letter are as follows:

- 1) EPA Form 8570-1: Application for Pesticide Registration
- 2) EPA Form 8570-34: Certification With Respect To Citation Of Data
- 3) Proposed Label for SmartFresh SmartTabs (5 copies)
- 4) Confidential Statement Of Formula for SmartFresh SmartTabs
- 5) Data Matrix for Previously Submitted Studies
- 6) Data Matrix for New Studies

Please assign MRID numbers to the enclosed studies. You may contact me by telephone (215-641-7397), fax (215-619-1629) or e-mail (rlarkin@agrofresh.com) if you have any questions or need additional information.

Sincerely,



Robert H. Larkin
Vice President, Research & Regulatory Affairs

Enclosures (reports in triplicate):

Guideline Reference Number	AgroFresh Inc. Report No.	Report Title	MRID
Series 830 Group A	AF02-054	Product Chemistry Series 830 Group A: Product Identity, Composition and Analysis of SmartFresh™ Tablet Formulation	
Series 830 Group B	AF02-059	Product Chemistry Series 830 Group B: Physical and Chemical Characteristics of SmartFresh™ Tablet Formulation	
None	AF02-089	Description and Composition of the SmartFresh™ SmarTabs Formulation and Activator Kit	
OPPTS 870.1100	02RC-010	Acute Oral Toxicity/LD 50 in Rats	

N/FT

B

 EPA	United States Environmental Protection Agency Washington, DC 20460	<input checked="" type="checkbox"/> Registration <input type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number 299970
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Application for Pesticide - Section I

1. Company/Product Number 71297-G	2. EPA Product Manager Driss Benmhend	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) SmartFresh SmartTabs	PM# 92	
5. Name and Address of Applicant (Include ZIP Code) AgroFresh Inc./Rohm and Haas Company 100 Independence Mall West Philadelphia, PA 19106-2399 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

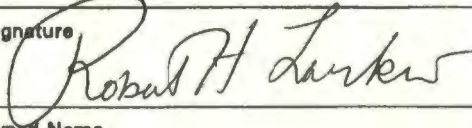
<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)
Application for a Section 3 registration for SmartFresh SmartTabs. SmartFresh SmartTabs is a new formulation of the active ingredient 1-methylcyclopropene (1-MCP) intended for indoor postharvest treatment of a variety of fruits.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input checked="" type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) Blister pack	
Certification must submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container Blister pack containing 10 tablets		5. Location of Label Directions <input type="checkbox"/> Booklet attached to blister pack	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Robert H. Larkin	Title Vice President of Regulatory Affairs	Telephone No. (Include Area Code) 215-641-7397
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Vice President of Regulatory Affairs	
4. Typed Name Robert H. Larkin	5. Date January 21, 2003	



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☐ Other

OPP Identifier Number

299970

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name)	PM#	
5. Name and Address of Applicant (Include ZIP Code) <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
If "Yes" Unit Packaging wgt. _____ No. per container _____ Certification must be submitted		If "Yes" Package wgt. _____ No. per container _____			
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name	Title	Telephone No. (Include Area Code)
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature	3. Title	
4. Typed Name	5. Date	

PAPERWORK REDUCTION ACT NOTICE and INSTRUCTIONS

PAPERWORK REDUCTION ACT NOTICE: Public reporting burden for this collection of information is estimated to average 0.85 hour per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch, (2136), U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460.

INSTRUCTIONS: This form is to be used for all applications for new registration, and use reregistration, amendment, resubmission, to applications for notifications, final printed labeling, reregistration, etc. In order to process an application for a new registration submitted on this form, the following material must accompany the application:

1. Certification with Respect to Citation of Data (EPA Form 8570-29). [If not exempted by 40 CFR 152.81 (b) (4)];
2. Confidential Statement of Formula (EPA Form 8570-4);
3. Formulator's Exemption Statement (EPA Form 8570-27);
4. Five copies of draft labeling;
5. Three copies of any data submitted;
6. Authorization letter where applicable;
7. Matrices where applicable.

Submission of Labeling - Labeling should first be submitted in the form of draft labels with all applications for new registration. Such draft labels may be in the form of typed label text on 8.5 x 11 inch paper for submission or a mockup of the proposed label. If prepared for mockup, it should be constructed in a way as to facilitate storage in an 8.5 x 11 inch file. Mockup labels significantly smaller than 8.5 x 11 inches should be mounted on 8.5 x 11 inch paper for submission.

Submission of Data - Data submitted in support of this application must be submitted in accordance with PR Notice 86-5.

SPECIFIC INSTRUCTIONS: Please read the instructions listed below before completing this application. First determine the type of registration action, listed in Block A, for which you are submitting this application. For applications submitted in connection with New Registration actions, Sections I, III, and IV must be completed by the applicant. For applications submitted in connection with amended reregistration actions, resubmissions, notifications, reregistrations, etc., Sections I, II, and IV must be completed by the applicant.
Block A - Check the appropriate action for which you are submitting this form.

SECTION I - This section must be completed, as applicable, for all registration actions.

1. **Company/Product Number** - Insert your Company Number, if one has been assigned by EPA. This number may have been assigned to you as a basic registrant, a distributor, or as an establishment. If your product is registered, insert the Product Number.
2. **EPA Product Manager** - If known, fill in the name and PM number of the EPA Product Manager.
3. **Proposed Classification** - Specify the proposed classification of this product.
4. **Product Name** - Enter the complete product name of this pesticide as it will appear on the label. The name must be specific to this product only. Duplication of names is not permitted among products of the same company. Do not include any brand name or company line designations.
5. **Name and Address of Applicant** - The name of the firm or person and address shown in your application is the person or firm to whom the registration will be issued. If you are acting in behalf of another party, you must submit authorization from that party to act for them in registration matters. An applicant not residing in the United States must have an authorized agent residing in the United States to act for them in all registration matters. The name and complete mailing address of such an agent must accompany this application.
6. **Expedited Review** - FIFRA section 3 (c) 3 (B) provides for expedited review of applications for registration, or amendments to existing registrations, that are similar or identical to other pesticide products that are currently registered with the EPA. In order for your application to be eligible for expedited review, you must provide us with the EPA Registration Number and product name of the product you believe is similar to or identical to your product. The product must be similar or identical in both formulation and labeled uses.

SECTION II - This section must be completed for all applications submitted to amend the registration only of a currently registered product (Amendment), for a resubmission in response to an Agency letter, for notifications to the Agency, for the submission of final printed labeling, for reregistration and for any other action that pertains to a specific EPA-registered product. This section is not to be used for a new application for registration.

1. **Subject of submission** - Check the applicable block and provide the Agency letter date if appropriate. Provide a brief explanation of the purpose(s) for the submission, such as "the addition of a site, pest or crop (specify)"; "amend the Confidential Statement of Formula by..."; "reregistration submission"; "general label revision of use directions." Attach a separate page if additional space is needed.

SECTION III (Packaging and Container Information) - This Section must be completed for all applications submitted in connection with new registration or applicable amendments.

1. **Type of Packaging** - Check the appropriate block if your product will be packaged in the indicated packaging types. Indicate the size of the individual packets and number per retail container.
2. **Type of Retail Container** - Indicate type of container in which product will be marketed.
3. **Location of Net Contents** - Indicate the location of the net contents information for your product.
4. **Size(s) of Retail Container** - Specify the net contents of all retail containers for your product.
5. **Location of Use Directions** - Indicate the location of the use directions for your product.
6. **Manner in which label is affixed to product** - Indicate the method product label is attached to retail container.

SECTION IV (Contact Point) - This Section must be completed for all applications for Registration actions, i.e., new products registration, resubmission, "me-too," reregistration, etc.

- 1-5. Self-explanatory.
6. EPA Use Only.



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☐ Other

OPP Identifier Number

299970

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name)	PM# 12	
5. Name and Address of Applicant (Include ZIP Code) <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
If "Yes" Unit Packaging wgt. No. per container					
If "Yes" Package wgt. No. per container					
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container	5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product		
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name	Title	Telephone No. (Include Area Code)
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature	3. Title	
4. Typed Name	5. Date	

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INSTRUCTIONS: This form is to be used for all applications for new registration, end use reregistration, amendment, resubmission, to applications for notifications, final printed labeling, reregistration, etc. In order to process an application for a new registration submitted on this form, the following material must accompany the application:

1. Certification with Respect to Citation of Data (EPA Form 8570-29). [If not exempted by 40 CFR 152.81 (b) (4)];
2. Confidential Statement of Formula (EPA Form 8570-4);
3. Formulator's Exemption Statement (EPA Form 8570-27);
4. Five copies of draft labeling;
5. Three copies of any data submitted;
6. Authorization letter where applicable;
7. Matrices where applicable.

Submission of Labeling - Labeling should first be submitted in the form of draft labels with all applications for new registration. Such draft labels may be in the form of typed label text on 8.5 x 11 inch paper for submission or a mockup of the proposed label. If prepared for mockup, it should be constructed in a way as to facilitate storage in an 8.5 x 11 inch file. Mockup labels significantly smaller than 8.5 x 11 inches should be mounted on 8.5 x 11 inch paper for submission.

Submission of Data - Data submitted in support of this application must be submitted in accordance with PR Notice 86-5.

SPECIFIC INSTRUCTIONS: Please read the instructions listed below before completing this application. First determine the type of registration action, listed in Block A, for which you are submitting this application. For applications submitted in connection with New Registration actions, Sections I, III, and IV must be completed by the applicant. For applications submitted in connection with amended reregistration actions, resubmissions, notifications, reregistrations, etc., Sections I, II, and IV must be completed by the applicant.

Block A - Check the appropriate action for which you are submitting this form.

SECTION I - This section must be completed, as applicable, for all registration actions.

1. **Company/Product Number** - Insert your Company Number, if one has been assigned by EPA. This number may have been assigned to you as a basic registrant, a distributor, or as an establishment. If your product is registered, insert the Product Number.
2. **EPA Product Manager** - If known, fill in the name and PM number of the EPA Product Manager.
3. **Proposed Classification** - Specify the proposed classification of this product.
4. **Product Name** - Enter the complete product name of this pesticide as it will appear on the label. The name must be specific to this product only. Duplication of names is not permitted among products of the same company. Do not include any brand name or company line designations.
5. **Name and Address of Applicant** - The name of the firm or person and address shown in your application is the person or firm to whom the registration will be issued. If you are acting in behalf of another party, you must submit authorization from that party to act for them in registration matters. An applicant not residing in the United States must have an authorized agent residing in the United States to act for them in all registration matters. The name and complete mailing address of such an agent must accompany this application.
6. **Expedited Review** - FIFRA section 3 (c) 3 (B) provides for expedited review of applications for registration, or amendments to existing registrations, that are similar or identical to other pesticide products that are currently registered with the EPA. In order for your application to be eligible for expedited review, you must provide us with the EPA Registration Number and product name of the product you believe is similar to or identical to your product. The product must be similar or identical in both formulation and labeled uses.

SECTION II - This section must be completed for all applications submitted to amend the registration only of a currently registered product (Amendment), for a resubmission in response to an Agency letter, for notifications to the Agency, for the submission of final printed labeling, for reregistration and for any other action that pertains to a specific EPA-registered product. This section is not to be used for a new application for registration.

1. **Subject of submission** - Check the applicable block and provide the Agency letter date if appropriate. Provide a brief explanation of the purpose(s) for the submission, such as "the addition of a site, pest or crop (specify)"; "amend the Confidential Statement of Formula by..."; "reregistration submission"; "general label revision of use directions." Attach a separate page if additional space is needed.

SECTION III (Packaging and Container Information) - This Section must be completed for all applications submitted in connection with new registration or applicable amendments.

1. **Type of Packaging** - Check the appropriate block if your product will be packaged in the indicated packaging types. Indicate the size of the individual packets and number per retail container.
2. **Type of Retail Container** - Indicate type of container in which product will be marketed.
3. **Location of Net Contents** - Indicate the location of the net contents information for your product.
4. **Size(s) of Retail Container** - Specify the net contents of all retail containers for your product.
5. **Location of Use Directions** - Indicate the location of the use directions for your product.
6. **Manner in which label is affixed to product** - Indicate the method product label is attached to retail container.

SECTION IV (Contact Point) - This Section must be completed for all applications for Registration actions, i.e., new products registration, resubmission, "me-too," reregistration, etc.

- 1-5. Self-explanatory.
6. EPA Use Only.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, D.C. 20460

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Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number AgroFresh Inc./Rohm and Haas Company 100 Independence Mall West Phila. PA 19106-2399	EPA Registration Number/File Symbol 71297-x 3
Active Ingredient(s) and/or representative test compound(s) 1-methylcyclopropene	Date January 21, 2003
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Agricultural crops, indoors	Product Name SmartFresh SmartTabs

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
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SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☐ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

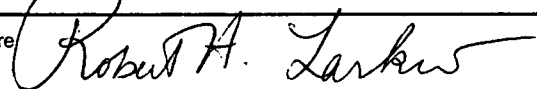
I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date 1/21/2003	Typed or Printed Name and Title Robert H. Larkin, VP of Regulatory Affairs
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, SW
Washington, DC 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX (NEW STUDIES)

Date January 21, 2003		EPA Reg. No./File Symbol 71297-xx		Page 1	
Applicant's/Registrant's Name and Address: AgroFresh, Inc., a subsidiary of Rohm and Haas Company 100 Independence Mall West, Philadelphia, PA 19106-2399		Product SmartFresh™ SmartTabs			
Active Ingredient: 1-Methylcyclopropene					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note

	R. Jacobson; Product Chemistry Series 830 Group A: Product Identity, Composition, and Analysis of SmartFresh™ Tablet Formulation, Report AF02-054		AgroFresh Inc.; a subsidiary of Rohm and Haas Company	Own	
	R. Jacobson, D. Verona; Product Chemistry Series 830 Group B: Physical and Chemical Characteristics of SmartFresh™ Tablet Formulation, Report AF02-059		AgroFresh Inc.; a subsidiary of Rohm and Haas Company	Own	
	R. Jacobson; Description and Composition of the SmartFresh™ SmartTabs Formulation and Activator Kit, Report AF02-089		AgroFresh Inc.; a subsidiary of Rohm and Haas Company	Own	
	D. R. Verven, Acute Oral Toxicity/LD50 in Rats, Report 02RC-010		AgroFresh Inc.; a subsidiary of Rohm and Haas Company	Own	

Signature

Robert H. Larkin

Name and Title:

Robert H. Larkin
Vice President, Research & Regulatory Affairs

Date

January 21, 2003



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, SW
Washington, DC 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX (Previously Submitted Studies)

Date January 21, 2003		EPA Reg. No./File Symbol 71297-xx		Page 1 of 10	
Applicant's/Registrant's Name and Address: AgroFresh, Inc., a subsidiary of Rohm and Haas Company 100 Independence Mall West, Philadelphia, PA 19106-2399		Product SmartFresh™ SmartTabs			
Active Ingredient: 1-Methylcyclopropene					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note

Series 151A-10	J. Daly; Product Identity and Disclosure of Ingredients for 1-MethylCyclopropene (MCP); BioTechnologies for Horticulture, Inc. (BTH) Document No. 1; 24Oct97.	445170-01	AgroFresh, Inc. (formerly BioTechnologies for Horticulture, Inc.)	Own	
Series 151-10	B. Kourelis; Manufacturing Process for Methyl-Cyclopropene (MCP); BTH Document No. 2; Sep97.	444647-01	AgroFresh, Inc. (formerly BioTechnologies for Horticulture, Inc.)	Own	
OPPTS 885.1200 (151-10) OPPTS 885.1500 (151-16)	A. Roberts; Manufacturing Process and Certified Limits for EthylBloc - Supplemental Data; BTH; 13Jan99.	Not Known	AgroFresh, Inc. (formerly BioTechnologies for Horticulture, Inc.)	Own	
Series 151A-12	J. Daly; Discussion of the Formation of Unintentional Ingredients in EthylBloc: Methyl-cyclopropene (MCP); BTH Document No. 3; Sep97.	445170-02	AgroFresh, Inc. (formerly BioTechnologies for Horticulture, Inc.)	Own	
Series 151A-13	B. Kourelis; Preliminary Analysis of Methyl-cyclopropene (MCP); BTH Document No. 4; Nov97.	444647-02	AgroFresh, Inc. (formerly BioTechnologies for Horticulture, Inc.)	Own	
Series 152A-15	J. Daly; Certification of Ingredient Limits for Ethylbloc™; BTH Document No. 5; Nov97.	445170-03	AgroFresh, Inc. (formerly BioTechnologies for Horticulture, Inc.)	Own	

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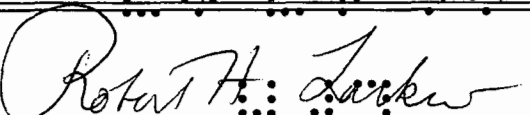


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DATA MATRIX (Previously Submitted Studies)

Date January 21, 2003		EPA Reg. No./File Symbol 71297-xx		Page 2 of 10	
Applicant's/Registrant's Name and Address: AgroFresh, Inc., a subsidiary of Rohm and Haas Company 100 Independence Mall West, Philadelphia, PA 19106-2399		Product SmartFresh™ SmartTabs			
Active Ingredient: 1-Methylcyclopropene					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Series 151-16	J. Daly; Analytical Method for Certified Limits of Methylcyclopropene (MCP); BTH Document No. 6; Oct97.	444647-03	AgroFresh, Inc. (formerly BioTechnologies for Horticulture, Inc.)	Own	
Series 63	J. Bennick; EthylBloc (MCP): Product Chemistry for Non-Combustible End-Use Solids; Stillmeadow Inc. Study No. 3454-97; 11Nov97.	445170-04	AgroFresh, Inc. (formerly BioTechnologies for Horticulture, Inc.)	Own	
OPPTS 830	A. Roberts; Physical and Chemical Properties of EthylBloc - Part II; BTH; 27May98.	445676-01	AgroFresh, Inc. (formerly BioTechnologies for Horticulture, Inc.)	Own	
151-10 151-16	A. Roberts; Manufacturing Process and Certified Limits for EthylBloc® - Supplemental Data; 13Jan99	Not Known	AgroFresh, Inc. (formerly BioTechnologies for Horticulture, Inc.)	Own	
40 CFR Part 158.690 (152-10)	R. Pfeifer; MCP Acute Oral Toxicity Study; Toxikon Corp. Study No. 96G-2085; 31Dec96.	444647-04	AgroFresh, Inc. (formerly BioTechnologies for Horticulture, Inc.)	Own	
40 CFR Part 158.690 (152-11)	R. Pfeifer; MCP Acute Dermal Toxicity Study (Single Exposure); Toxikon Corp. Study No. 96G-2086; 30Jan97.	444647-05	AgroFresh, Inc. (formerly BioTechnologies for Horticulture, Inc.)	Own	
Signature 			Name and Title: Robert H. Larkin Vice President, Research & Regulatory Affairs		Date January 21, 2003

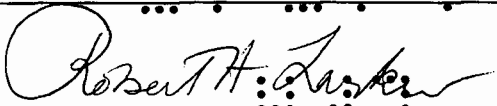


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Applicant's/Registrant's Name and Address: AgroFresh, Inc., a subsidiary of Rohm and Haas Company 100 Independence Mall West, Philadelphia, PA 19106-2399		Product SmartFresh™ SmartTabs			
Active Ingredient: 1-Methylcyclopropene					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
152-12	J. Bennick; EthylBloc (MCP): Acute Inhalation Toxicity Study in Rats; Stillmeadow Inc. Study No. 3333-97; 10Sep97.	444647-06	AgroFresh, Inc. (formerly BioTechnologies for Horticulture, Inc.)	Own	
40 CFR Part 158.690 (152-13)	J. Prezioso; MCP Primary Eye Irritation Study; Toxikon Corp. Study No. 96G-2089; 13Dec96.	444647-07	AgroFresh, Inc. (formerly BioTechnologies for Horticulture, Inc.)	Own	
40 CFR Part 158.690 (152-14)	R. Pfeifer; MCP Primary Dermal Irritation Study; Toxikon Corp. Study No. 96G-2088; 13Dec96	444647-08	AgroFresh, Inc. (formerly BioTechnologies for Horticulture, Inc.)	Own	
152-15	R. Pfeifer; MCP Buehler Sensitization Test; Toxikon Corp. Study No. 96G-2087; 31Dec96	445170-05	AgroFresh, Inc. (formerly BioTechnologies for Horticulture, Inc.)	Own	
152-15	A. Roberts/TSG to D. Benmhend/EPA; 27May98; missing pages 29-42 for R. Pfeifer; MCP Buehler Sensitization Test; Toxikon Corp. Study No. 96G-2087; 31Dec96.	Not Known	AgroFresh, Inc. (formerly BioTechnologies for Horticulture, Inc.)	Own	
152-16	J. Daly; Hypersensitivity Incidents Report for Methylcyclopropene (MCP); BTH Document No. 14; Oct97.	445170-06	AgroFresh, Inc. (formerly BioTechnologies for Horticulture, Inc.)	Own	
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Applicant's/Registrant's Name and Address: AgroFresh, Inc., a subsidiary of Rohm and Haas Company 100 Independence Mall West, Philadelphia, PA 19106-2399		Product SmartFresh™ SmartTabs			
Active Ingredient: 1-Methylcyclopropene					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note

152-16	A.Roberts/TSG to D. Benmhend/EPA; 27May98; corrected Statement of No Data Confidentiality Claims for J. Daly; Hypersensitivity Incidents Report for Methylcyclopropene (MCP); BTH Document No. 14; Oct97.	Not Known	AgroFresh, Inc. (formerly BioTechnologies for Horticulture, Inc.)	Own	
84-2	J. Prezioso; MCP <i>Salmonella Typhimurium</i> Reverse Mutation Assay - FIFRA; Toxikon Corp. Study No. 96G-2139; 13Dec96.	444647-09	AgroFresh, Inc. (formerly BioTechnologies for Horticulture, Inc.)	Own	
84-2	M. Cifone; Mutagenicity Test on MCP in the L5178Y TK +/- Mouse Lymphoma Forward Mutation Assay; Covance Study No. 18384-0- 431; 10Jul97.	444647-10	AgroFresh, Inc. (formerly BioTechnologies for Horticulture, Inc.)	Own	
84-2	J. Ivett; Mutagenicity Test on MCP in an <i>In Vivo</i> Mouse Micronucleus Assay; Covance Study No. 18384-0-455; 23May97	444647-11	AgroFresh, Inc. (formerly BioTechnologies for Horticulture, Inc.)	Own	
Not Applicable	G. Hazelton; Petition for an Exemption from the Requirement of Tolerances for Residues of 1- Methylcyclopropene on Food Commodities; Report 00R-1012; 04Apr00	Not Known	AgroFresh, Inc. (formerly BioTechnologies for Horticulture, Inc.)	Own	Document submitted to EPA 06Apr00

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Applicant's/Registrant's Name and Address: AgroFresh, Inc., a subsidiary of Rohm and Haas Company 100 Independence Mall West, Philadelphia, PA 19106-2399		Product SmartFresh™ SmartTabs			
Active Ingredient: 1-Methylcyclopropene					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Not Applicable	S. Longacre; Rationale for Waivers of Study Requirements for Registration of 1-Methylcyclopropene on Post-Harvest Fruits and Vegetables; Report AGREG-00-02; 04Apr00	Not Known	AgroFresh, Inc. (formerly BioTechnologies for Horticulture, Inc.)	Own	Document submitted to EPA 06Apr00
PR Notice 97-1	S. Longacre; 1-Methylcyclopropene on Post Harvest Fruits and Vegetables; An Assessment of the Risk Criteria Established in the Food Quality Protection Act [FQPA] Supporting an Exemption from the Requirement of Tolerances for BioTechnologies for Horticulture, Inc. Pesticide Petition - Unassigned (1-Methylcyclopropene on Post-Harvest Fruits and Vegetables); Report AGREG-00-01; 05Apr00	450896-01	AgroFresh, Inc. (formerly BioTechnologies for Horticulture, Inc.)	Own	Document submitted to EPA 06Apr00
Not Applicable	W.D. Shade; 1-Methylcyclopropene (1-MCP): Industrial Source Complex (ISCST3) Dispersion Modeling of Air Emissions from Controlled Atmosphere Facilities; Report 00R-1066; 17Jan01	453171-01	AgroFresh, Inc./Rohm and Haas Company	Own	Document submitted to EPA 29Jan01

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Name and Title:

Robert H. Larkin
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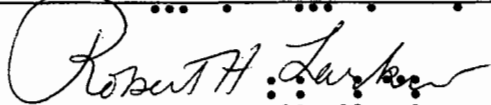
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Date January 21, 2003		EPA Reg. No./File Symbol 71297-xx		Page 6 of 10	
Applicant's/Registrant's Name and Address: AgroFresh, Inc.; a subsidiary of Rohm and Haas Company 100 Independence Mall West, Philadelphia, PA 19106-2399		Product SmartFresh™ SmartTabs			
Active Ingredient: 1-Methylcyclopropene					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note

152-10 (OPPTS 870.1100)	J. R. Parno, L. P. Craig, and S. L. Eberly; 1-Methylcyclopropene Alpha-Cyclodextrin Complex (3.3% a.i.): Acute Oral Toxicity Study in Male and Female Rats; Rohm and Haas Report 00R-199; 08Feb01	45380308	AgroFresh, Inc.; a subsidiary of Rohm and Haas Company	Own	Study submitted to EPA 06Apr01
152-12 (OPPTS 870.1300)	J. S. Ferguson, L. P. Craig, and H. J. Bernacki; 1-Methylcyclopropene: Acute Inhalation Toxicity Study in Rats; Rohm and Haas Report 00R-180; 08Feb01	45380301	AgroFresh, Inc.; a subsidiary of Rohm and Haas Company	Own	Study submitted to EPA 06Apr01
84-2 (OPPTS 870.5100)	P. J. O'Neill and C. B. Frederick; 1-Methylcyclopropene Vapor Released from 1-Methylcyclopropene Alpha-Cyclodextrin Complex (3.3% a.i.): <i>Salmonella typhimurium</i> Gene Mutation Assay; Rohm and Haas Report 00R-193A; 27Feb01	45380302	AgroFresh, Inc.; a subsidiary of Rohm and Haas Company	Own	Study submitted to EPA 06Apr01
84-2 (OPPTS 870.5300)	M. A. Cifone; 1-Methylcyclopropene Vapor Released From 1-Methylcyclopropene Alpha-Cyclodextrin Complex (3.3% a.i.): CHO HGPRT Forward Mutation Assay with a Confirmatory Assay and Duplicate Cultures; Rohm and Haas Report 00RC-195; 27Mar01	45380303	AgroFresh, Inc.; a subsidiary of Rohm and Haas Company	Own	Study submitted to EPA 06Apr01

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Applicant's/Registrant's Name and Address: AgroFresh, Inc., a subsidiary of Rohm and Haas Company 100 Independence Mall West, Philadelphia, PA 19106-2399		Product SmartFresh™ SmartTabs			
Active Ingredient: 1-Methylcyclopropene					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
84-2 (OPPTS 870.5375)	H. Murli; 1-Methylcyclopropene Vapor Released From 1-Methylcyclopropene Alpha-Cyclodextrin Complex (3.3% a.i.): Chromosomal Aberrations in Cultured Human Peripheral Blood Lymphocytes; <i>In Vitro</i> Cytogenetic Study in Human Lymphocytes; Rohm and Haas Report 00RC-194; 14Mar01	45380304	AgroFresh, Inc.; a subsidiary of Rohm and Haas Company	Own	Study submitted to EPA 06Apr01
84-2 (OPPTS 870.5395)	J. L. Sames and C. B. Frederick; 1-Methylcyclopropene: Micronucleus Assay in CD-1 Mouse Bone Marrow Cells; Rohm and Haas Report 00R-232; 05Feb01	45380305	AgroFresh, Inc.; a subsidiary of Rohm and Haas Company	Own	Study submitted to EPA 06Apr01
None	J. S. Ferguson, L. P. Craig, and K. R. Lampe; 1-Methylcyclopropene Two-Week Inhalation Range-Finding Study in Female Rats; Rohm and Haas Report 00R-183A; 22Mar01	45380306	AgroFresh, Inc.; a subsidiary of Rohm and Haas Company	Own	Study submitted to EPA 06Apr01
None	S. L. Longacre and G. A. Hazelton; 1-Methylcyclopropene (1-MCP) Dietary and Worker Risk Assessment; Rohm and Haas Report AGREG-01-01; 05Apr01	45380307	AgroFresh, Inc.; a subsidiary of Rohm and Haas Company	Own	Study submitted to EPA 06Apr01

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Applicant's/Registrant's Name and Address: AgroFresh, Inc., a subsidiary of Rohm and Haas Company 100 Independence Mall West, Philadelphia, PA 19106-2399		Product SmartFresh™ SmartTabs		
Active Ingredient: 1-Methylcyclopropene				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
				Note

171-4	D. J. Verona; 14C-1-Methylcyclopropene (1-MCP) Preliminary Results of 14C-Residues in Apples; Rohm and Haas Report TR 34-01-30; 05Apr01	45380309	AgroFresh, Inc.; a subsidiary of Rohm and Haas Company	Own	Study submitted to EPA 06Apr01
Series 830 Group A	J. C. Crawford; Product Chemistry Series 830 Group A: Product Identity, Composition, and Analysis of 1-MCP Formulation; Rohm and Haas Report APR-01-068; 17May01	45458601	AgroFresh, Inc.; a subsidiary of Rohm and Haas Company	Own	Study submitted to EPA 28Jun01
Series 830 Group A	W. Hu; GLP Validation of Test Method TM-2000-245-01; Rohm and Haas Report APR-01-017; 19Mar01	45458602	AgroFresh, Inc.; a subsidiary of Rohm and Haas Company	Own	Study submitted to EPA 28Jun01
Series 830 Group B	J. C. Crawford; Product Chemistry Series 830 Group B: Physical and Chemical Characteristics of 1-MCP Formulation; Rohm and Haas Report APR-01-069; 27Apr01	45458603	AgroFresh, Inc.; a subsidiary of Rohm and Haas Company	Own	Study submitted to EPA 28Jun01
152-11 (OPPTS 870.1200)	J. R. Parno, L. P. Craig, and S. L. Eberly; 1-Methylcyclopropene Alpha-Cyclodextrin Complex (3.3% a.i.): Acute Dermal Toxicity Study in Male and Female Rats; Rohm and Haas Report 00R-200; 08Feb01	45458604	AgroFresh, Inc.; a subsidiary of Rohm and Haas Company	Own	Study submitted to EPA 28Jun01

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Applicant's/Registrant's Name and Address: AgroFresh, Inc., a subsidiary of Rohm and Haas Company 100 Independence Mall West, Philadelphia, PA 19106-2399		Product SmartFresh™ SmartTabs			
Active Ingredient: 1-Methylcyclopropene					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
152-14 (OPPTS 870.2500)	J. R. Parno, L. P. Craig, and S. L. Eberly; 1-Methylcyclopropene Alpha-Cyclodextrin Complex (3.3% a.i.): Skin Irritation Study in Rabbits; Rohm and Haas Report 00R-201; 08Feb01	45458605	AgroFresh, Inc.; a subsidiary of Rohm and Haas Company	Own	Study submitted to EPA 28Jun01
152-13 (OPPTS 870.2400)	J. R. Parno, L. P. Craig, and S. L. Eberly; 1-Methylcyclopropene Alpha-Cyclodextrin Complex (3.3% a.i.): Eye Irritation Study in Rabbits; Rohm and Haas Report 00R-202; 08Feb01	45458606	AgroFresh, Inc.; a subsidiary of Rohm and Haas Company	Own	Study submitted to EPA 28Jun01
152-15 (OPPTS 870.2600)	J. R. Parno, D. M. Anderson, and T. L. Danberry; 1-Methylcyclopropene Alpha-Cyclodextrin Complex (3.3% a.i.): Dermal Sensitization Study in Guinea Pigs - Maximization Test; Rohm and Haas Report 00R-203; 07Feb 01	45458607	AgroFresh, Inc.; a subsidiary of Rohm and Haas Company	Own	Study submitted to EPA 28Jun01
152-23 (OPPTS 870.3700)	S. L. Wood, L. P. Craig, H. J. Bernacki, and T. L. Danbury; 1-Methylcyclopropene: Inhalation (Whole Body) Developmental Toxicity Study in Rats; Rohm and Haas Report 00R-181;	45458608	AgroFresh, Inc.; a subsidiary of Rohm and Haas Company	Own	Study submitted to EPA 28Jun01

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Active Ingredient: 1-Methylcyclopropene					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note

(OPPTS 870.3465)	J. S. Ferguson, E. M. Anderson, H. J. Bernacki, Jr.; 1-Methylcyclopropene: 3-month Inhalation (Whole Body) Toxicity Study in Rats; Rohm and Haas Report 00R-183; 19Oct01	45609001	AgroFresh Inc.; a subsidiary of Rohm and Haas Company	Own	Study submitted to EPA 14Dec01
171-4	D. Verona; C14-1-Methylcyclopropene (1-MCP) Apple Residue Study; Rohm and Haas Report AF-01-141; 12Dec01	45609002	AgroFresh Inc.; a subsidiary of Rohm and Haas Company	Own	Study submitted to EPA 14Dec01
Not Applicable	B. A. Snyder, B. M. Stevens; Determination of 3-Chloro-2-Methylpropene Concentration in Chamber Treated with 1-Methylcyclopropene; Rohm and Haas Report AF-01-143; 4Dec01	45609003	AgroFresh Inc.; a subsidiary of Rohm and Haas Company	Own	Study submitted to EPA 14Dec01
Not Applicable	G. A. Hazelton; 1-Methylcyclopropene (1-MCP): Assessment of Worker and Consumer Risk; Rohm and Haas Report 01R-1071, 26Nov01	45609004	AgroFresh Inc.; a subsidiary of Rohm and Haas Company	Own	Study submitted to EPA 14Dec01

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